

2021 Annual Compliance Report for Honolulu Harbor and Kalaeloa Barbers Point Harbor



Small Municipal Separate Storm Sewer System (Small MS4) General Permit Program for

- Honolulu Harbor - NGPC Permit: HI 03KB482
- Kalaeloa Barbers Point Harbor - NGPC Permit: HI 03KB488

State of Hawaii
Department of Transportation, Harbors Division
79 South Nimitz Highway
Honolulu, Hawaii 96813



**PROTECT OUR
HARBOR WATERS**
Mālama I Ke Awa Kai

January 28, 2022

NPDES Small MS4 General Permit
2021 Annual Compliance Report for
Honolulu Harbor and Kalaeloa Barbers Point Harbor

Certification:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that this document and its attachments were prepared either by me personally or under my direction or supervision in a manner designed to ensure that qualified and knowledgeable personnel properly gather and present the information contained therein. I further certify, based on my personal knowledge or on my inquiry of those individuals immediately responsible for obtaining the information, that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowingly and willfully submitting a materially false statement.


Signature:		Date:	Jan 26, 2022
Printed Name:	JADE T. BUTAY		
Title:	Director of Transportation		

TABLE OF CONTENTS

1	EXECUTIVE SUMMARY	1
2	GENERAL NPDES PERMIT INFORMATION.....	2
2.1	Permit Compliance Assistance	3
2.2	Stormwater Management Plan	4
3	NPDES PERMIT	6
3.1	SWMP MODIFICATION	6
3.1.1	Cover Page	6
3.1.2	Section A	7
3.1.3	Section B	9
3.1.4	Section C	9
3.1.5	Section D	10
3.1.6	Section E.....	10
3.2	SWMP Core Progress Evaluation	10
3.2.1	Environmental Compliance Audit	12
3.2.2	Program Effectiveness	12
3.2.3	Challenges and Proposed Modifications for 2022	14
3.2.4	Consent Decree Timelines	14
3.2.5	Water Quality Monitoring Data	14
3.2.6	Stormwater Messages	14
4	STORMWATER MINIMUM CONTROL MEASURES.....	16
4.1	General Program Requirements.....	17
4.2	Public Education and Outreach	20
4.3	Illicit Discharge Detection and Elimination Program.....	32
4.4	Construction Site Stormwater Runoff Control	40
4.5	Post-Construction Stormwater Management in New Development and Redevelopment.....	46
4.6	Pollution Prevention and Good Housekeeping	52
5	PROGRAM OUTPUTS AND ACCOMPLISHMENTS	57
5.1	MS4 Program Expenses	57
5.2	Education, Involvement, and Training.....	59
5.3	Legal/Regulatory	61
5.4	Mapping and Illicit Discharges.....	62
5.5	HDOT-Harbors Tenants	63
5.6	Construction	64
5.7	Post-Construction Stormwater Management.....	66
5.8	Operations and Maintenance.....	66
6	CONCLUSION.....	69
7	ATTACHMENTS.....	70

LIST OF TABLES

Table 1.	NPDES Permit Compliance Assistance	3
Table 2.	Status of NPDES Permit Compliance	6
Table 3.	Status of BMPs	13
Table 4.	General Program Requirements	17

Table 5. Public Education and Outreach	21
Table 11. Education, Involvement, and Training	59
Table 12. Legal and Regulatory	61
Table 13. Mapping and Illicit Discharges	62
Table 14. HDOT-Harbors Tenants	64
Table 15. Construction	65
Table 16. Post-Construction Stormwater Management.....	66
Table 17. Operations and Maintenance	67

LIST OF FIGURES

Figure 1. Virtual Protect Our Water Conference	11
Figure 2. AMS.....	12
Figure 3. 2021 SWMP.....	14
Figure 4. Pollution Prevention Sign.....	15
Figure 5. 2021 Program Expenditures.....	58
Figure 6. Program Expenditures from 2014-2021	59
Figure 7. Number of People Trained from 2014-2021.....	61
Figure 8. Illicit Discharge Investigations from 2014-2021.....	63
Figure 9. 2021 Tenant Risk Ranking Distribution	64
Figure 10. Construction Inspections and Enforcement from 2014-2021	66
Figure 11. MS4 Maintenance and Debris Removal from 2014-2021.....	68

LIST OF ATTACHMENTS

Attachment 1.	Newspaper Advertisement Describing HDOT-Harbors Pollution Prevention Efforts
Attachment 2.	Outreach Handouts
Attachment 3.	Tenant Training
Attachment 4.	Construction and Post Construction Training
Attachment 5.	HDOT-Harbors Employee Training
Attachment 6.	Illicit Discharge Detection Elimination Training
Attachment 7.	Inspector Training
Attachment 8.	Tenant Inventory, Risk Rank, and Inspection Summary
Attachment 9.	Outfall Reconnaissance Inventory
Attachment 10.	Illicit Discharge Investigations
Attachment 11.	Construction Project Inventory and Inspection Summary
Attachment 12.	Reviewed Construction and Post-Construction Projects
Attachment 13.	Kalaehoa Barbers Point Harbor Stockpile Inspection Report
Attachment 14.	MS4 and Permanent BMP Inspection Log
Attachment 15.	Storm Drain Inspection and Cleaning
Attachment 16.	Street Sweeper Log
Attachment 17.	2021 Stormwater Management Plan

ACRONYMS AND ABBREVIATIONS

ACR	Annual Compliance Report
AG	State of Hawaii, Department of the Attorney General
AMS	Cityworks® Powered Asset Management System
BMP	Best Management Practices
CCH	City and County of Honolulu
CD	Consent Decree
CIP	Capital Improvement Project
COVID-19	Coronavirus Disease 2019
CSRPC	Construction Site Runoff Control Program
CWA	Clean Water Act
ENV	State of Hawaii, Department of Transportation, Office of Environmental Compliance
HDOH	State of Hawaii, Department of Health
HDOH-CWB	State of Hawaii, Department of Health, Clean Water Branch
HDOT	State of Hawaii, Department of Transportation
HDOT-Harbors	State of Hawaii, Department of Transportation, Harbors Division
ERP	Enforcement Response Plan
GIS	Geographic Information System
HAR	Hawaii Administrative Rules
HAR-E	HDOT-Harbors Division, Engineering Branch
HAR-EE	HDOT-Harbors Division, Engineering Branch, Environmental Section
HAR-EP	HDOT-Harbors Division, Engineering Branch, Planning Section
HAR-O	HDOT-Harbors Oahu District
HAR-PM	HDOT-Harbors Division, Property Management Staff
HAR-SI	HDOT-Harbors Division, Management Information Systems Staff
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measures
MEP	Maximum Extent Practicable
MOA	Memorandum of Agreement
MS4	Municipal Separate Storm Sewer System
NAV	Notice of Apparent Violation
NGPC	Notice of General Permit Coverage
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance Plan
ORI	Outfall Reconnaissance Inventory
ORIIP	Outfall Reconnaissance Inventory and Inspection Program
PBMP	Permanent Best Management Practices
PEAR	Program Element Audit Report
P2	Pollution Prevention
P2/GH	Pollution Prevention and Good Housekeeping
POTW	Publicly Owned Treatment Works
POW	Protect Our Water
ROE	Right-of-Entry
SHOT	Stormwater Hotline Occurrence Tracking
SIDR	Suspected Illicit Discharge Reporting
SSS O&MP	Storm Sewer System Operations and Maintenance Program

SWMP	Stormwater Management Plan
TEMY	Tenant Environmental Manager of the Year
TIM	Tenant Inspection Manual
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency

NPDES Small MS4 General Permit
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1 EXECUTIVE SUMMARY

This report summarizes performance metrics, accomplishments, and compliance with the 2021 Stormwater Management Plan (SWMP), Hawaii Administrative Rules (HAR) 11-55, Appendix K, and the requirements for the Honolulu Harbor and Kalaeloa Barbers Point Harbor that are described in the 2014 Consent Decree (CD) with the United States Environmental Protection Agency (USEPA) and State of Hawaii Department of Health (HDOH), and the State of Hawaii Department of Transportation (HDOT).

The State of Hawaii, Department of Health, Clean Water Branch (HDOH-CWB) issued the State of Hawaii, Department of Transportation, Harbors Division (HDOT-Harbors) two Notice of General Permit Coverages (NGPC) under HAR 11-55, Appendix K for their Small Municipal Separate Storm Sewer Systems (MS4s). The permit identification numbers HI 03KB482 for Honolulu Harbor and HI 03KB488 for Kalaeloa Barbers Point Harbor authorize discharges of stormwater and certain non-stormwater discharges to the adjacent harbors.

The SWMP was updated in 2021 (Attachment 17). The revisions to the SWMP are discussed in Section 3.1. This 2021 SWMP was updated to describe the more efficient measurable goals implemented by HDOT-Harbors to address the requirements of the Clean Water Act (CWA) and intent of six minimum control measures (MCMs) listed in the NGPC Appendix K permit. In 2021, HDOT-Harbors met all measurable goals in the 2021 SWMP.

The 2014 CD requires HDOT-Harbors to comply with all requirements of the CWA as well as the terms and conditions of the issued National Pollutant Discharge Elimination System (NPDES) Permits. In 2021, HDOT-Harbors met all compliance requirements and the timeline listed in the 2014 CD.

The six MCMs that initiated the HDOT-Harbors stormwater program have been determined to be effective in reducing the discharge of potential pollutants in stormwater. The small MS4 cleaning and street sweeping programs continue to prevent debris from entering adjacent receiving waters. The persistent training/outreach and inspection programs promote and help HDOT-Harbors employees, tenants, consultants, contractors, and general public with the following.

- Identify areas that could potentially generate illicit discharges and implement proper best management practices (BMPs) to defer such incidents from occurring.
- Identify and properly report an illicit discharge, and properly manage potential pollutants at their source to minimize negative impacts to the surrounding environment.

2 GENERAL NPDES PERMIT INFORMATION

State of Hawaii NPDES Program Permit Numbers:

Honolulu Harbor: HI 03KB482
Kalaeloa Barbers Point Harbor: HI 03KB488
Annual Report for Permit Year: 19

Reporting Period: January 1, 2021 – December 31, 2021

Permittee (Owner/Operator) Details:

Organization: State of Hawaii
Department of Transportation
Harbors Division

Mailing Address: State of Hawaii, Department of Transportation
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On March 7, 2003, HDOT-Harbors filed a Notice of Intent (NOI) for both Honolulu Harbor and Kalaeloa Barbers Point Harbor for their Small MS4s on the Island of Oahu. The HDOH-CWB issued HDOT-Harbors two NGPCs on May 19, 2003, assigning Small MS4 permit identification numbers HI 03KB482 to Honolulu Harbor and HI 03KB488 for Kalaeloa Barbers Point Harbor. Both NGPCs authorize discharge of stormwater and certain non-stormwater discharges from a Small MS4. HDOT-Harbors discharges only stormwater and certain non-stormwater discharges identified in Hawaii Administrative Rules (HAR) § 11-55, Appendix K, and flows from the stormwater outfalls identified in its NOIs and from any newly-constructed outfalls.

The general permit requires the permittee to:

1. Submit a SWMP within 120 calendar days of the date of the NGPC.
2. Develop, implement, and enforce the SWMP designed to reduce the discharge of pollutants from their Small MS4 to the maximum extent practicable (MEP) in order to protect adjacent harbor water quality.
3. Submit a new NOI with filing fee and obtain a new NGPC for any significant changes to the information submitted in the NOI. This NGPC cannot be modified.
4. Submit the annual compliance report (ACR) by January 28 of the following year in accordance with HAR § 11-55, Appendix K to the HDOH-CWB.

This document fulfills the HDOT-Harbors Division requirement to submit an ACR for the 2021 SWMP prior to the deadline of January 28, 2022.

2.1 PERMIT COMPLIANCE ASSISTANCE

The permittee relies on the entities listed in Table 1 to satisfy some of its NPDES permit obligations.

Table 1. NPDES Permit Compliance Assistance	
State of Hawaii Department of the Attorney General (AG)	<ul style="list-style-type: none"> • Makes changes to related Hawaii Revised Statutes and HAR as necessary. • Serves as primary interface with USEPA Region 9. • Provides legal authority and support to the approved Enforcement Response Plan (ERP).
State of Hawaii Department of Transportation Office of Environmental Compliance (ENV)	<ul style="list-style-type: none"> • Ensure HDOT complies with all federal, state, and local environmental regulations and permit, relating to MS4 compliance.
City and County of Honolulu Dept. of Planning & Permitting Site Development Division Wastewater Branch	<ul style="list-style-type: none"> • Authorizes and tracks drainage connections to its sanitary sewer system through Industrial Wastewater Discharge Permit.

Table 1. NPDES Permit Compliance Assistance	
Construction Managers (Various Firms)	<ul style="list-style-type: none"> • Conducts construction inspections. • Ensures construction sites comply with applicable environmental regulations.
Design Consultants (Various Firms)	<ul style="list-style-type: none"> • Incorporates stormwater management program requirements in applicable HDOT-Harbors facilities design projects.
HDOT-Harbors Oahu District	<ul style="list-style-type: none"> • Implements the Storm Sewer System Operations and Maintenance Program (SSS O&MP). • Use <i>Cityworks</i> to keep track of relevant activities. • Provides suggestions to improve the program, including purchasing new equipment. • Participates in and assists with enforcement.
EnviroServices & Training Center, LLC	<ul style="list-style-type: none"> • Assists HDOT-Harbors with: <ul style="list-style-type: none"> ○ Providing information to the public. ○ Tenant outreach and education. ○ Employee and contractor training. ○ Environmental inspections. • Reporting requirements of the CD, the Small MS4 NPDES permits, and other environmental regulations.
Element Environmental, LLC	<ul style="list-style-type: none"> • Assists HDOT-Harbors in meeting the environmentally related civil engineering and reporting requirements of the CD (if any), and other environmentally related investigations.
Insight Public Sector, Azteca <i>Cityworks</i> , and Woolpert, Inc.	<ul style="list-style-type: none"> • Assists HDOT-Harbors with installing, configuring, testing, and deploying its <i>Cityworks</i>® Powered asset management system (AMS) and providing ongoing licensing and software support services.

Copies of this ACR will be submitted to the Mr. Conner Adams of USEPA Region IX-PICO and the HDOH CWB.

2.2 STORMWATER MANAGEMENT PLAN

Revisions were made to the SWMP since the initial NOIs or the last ACR. The most recent version of the SWMP was updated and submitted in 2021 to include more practical and effective control measure activities that reflect the continuously evolving stormwater program (Attachment 17). Revisions to the SWMP are discussed in Section 3.1.

The Outfall Reconnaissance Inventory and Inspection Program (ORIIP) manual was revised during the 2021 reporting year. Revisions are discussed in Section 3.1. Dry-weather and wet-weather

outfall reconnaissance inspections were completed in 2021.

The Tenant Inspection Manual (TIM) was revised during the 2021 reporting year. Revisions are discussed in Section 3.1. In 2021, 100% of HDOT-Harbors tenants regulated under these two small MS4 permits were inspected.

The Construction Site Runoff Control Program (CSRCP) and the Post-Construction Stormwater Management Program Manuals were revised during the 2021 reporting year. Revisions are discussed in Section 3.1. 100% of regulated active construction sites were inspected in 2021.

No changes were made to the SSS O&MP Manual during the 2021 reporting year.

The ERP submitted in May 2020, was approved on December 22, 2021 via email by Mr. Connor Adams of USEPA Region IX-PICO at 300 Ala Moana Boulevard, #5-152, City and County of Honolulu (CCH) in State of Hawaii.

HDOT-Harbors small MS4s have not annexed land since obtaining permit coverage. There are no receiving water bodies newly listed as impaired nor total maximum daily loads have been established.

3 NPDES PERMIT

Table 2 provides a summary of HDOT-Harbors NPDES permit conditions and compliance actions.

Table 2. Status of NPDES Permit Compliance			
Description	Yes	No	Explanation
Permittee is in compliance with NPDES permits.	✓		<ul style="list-style-type: none">• HDOT-Harbors environmental program continued to strive in meeting the six MCMs of MS4 NPDES Appendix K permits for both the Honolulu Harbor and Kalaheo Barbers Point Harbor.• HDOT-Harbors has met permit requirements and is continuously working on improving existing programs.
Permittee has met all conditions of the 2021 SWMP.	✓		HDOT-Harbors has met all conditions of the 2021 SWMP.
Permittee has met all conditions of the CD (1:14-CV-00408-JMS-KSC).	✓		HDOT-Harbors has met all conditions of the Consent Decree.
Permittee is currently in compliance with record-keeping and reporting requirements.	✓		<ul style="list-style-type: none">• HDOT-Harbors has adequately retained required records.• HDOT-Harbors is currently using its AMS to manage its stormwater program work processes and related record-keeping in conjunction with its geographic information system (GIS) maps.

3.1 SWMP MODIFICATION

This section includes the revisions made to the SWMP (Attachment 17) during the reporting period as required by HAR 11-55 Appendix K. HDOT-Harbors made minor modifications to the SWMP sections A through E during the reporting period, which are provided below as well as other formatting and grammatical updates. The following general updates were made: formatting revisions included spelling, grammar, and spacing; updated all attachments with relevant information; and the slogan “*Mālama I Ke Kai*” was updated to reflect the revised version “*Mālama I Ke Awa Kai*.” The SWMP was finalized in November 2021.

3.1.1 Cover Page

Minor modifications were made to the SWMP Cover page which include updating the acronyms and contact phone numbers, as necessary.

3.1.2 Section A

- **Section A, Table 1-1 Roles and Responsibilities:** Additional roles and responsibilities were added, and current roles were updated where necessary.
- **Section A, 2.1.1 General Public Education and Outreach:** This section was revised to reflect the current stormwater awareness message “*Mālama I Ke Awa Kai*” which was updated in 2018 from the original phrase “*Mālama I Ke Kai*” for accuracy on the Hawaiian translation of “Protect Our Harbor Waters.” Additionally, website URLs were updated for accuracy.
- **Section A, BMP Table 2-1:** Minor updates to the table include revisions to a BMP activity or evaluation metric for clarification or to reflect the current evolving program. All other updates are discussed below.
 - Updated the stormwater awareness message “*Mālama I Ke Kai*” to “*Mālama I Ke Awa Kai*” and rephrased the evaluation metric for clarity.
 - Combined CD requirement 14.a.ii with 14.a.iii to remove redundancy.
 - Replaced the BMP activity for CD requirements 14.a.ii and SWMP A.3.1.4 from “set up and solicit a volunteer cleanup or storm drain stenciling activity” to “participate in the annual HDOT Protect Our Water Conference, or similar.” The evaluation metric and milestones were updated to reflect the BMP activity revision and will track the number of visitors to the HDOT-Harbors booth.
 - Updated the BMP activity for SWMP A.3.1.5. The Stormwater Hotline Occurrence Tracking (SHOT) was replaced with the current reporting method “Suspected Illicit Discharge Reporting” (SIDR). The evaluation metric was revised to reflect the evolving program.
 - Revised the evaluation metric for CD requirement 14.h.i and SWMP A.3.2.1. to determine if the new tenant package was developed or updated during the reporting year.
 - Revised the evaluation metric for CD requirement 14.e.i and SWMP A.3.2.2 to track tenants with updated information in HDOT-Harbors electronic inventory.
- **Section A, Table 2-1 Public Education and Outreach Compliance Checklist:** The stormwater awareness message was updated to reflect the changes made in 2018 from “*Mālama I Ke Kai*” to “*Mālama I Ke Awa Kai*.”
- **Section A, BMP Table 2-2 Public Involvement/Participation:** Removed this table since the CD requirements were from the 2009 SWMP and have since been incorporated into BMP Table 2-1.
- **Section A, Table 2-2 Public Involvement/Participation Checklist:** Updated table with relevant information on completed requirements.
- **Section A, 2.3.2 Outfall Reconnaissance Inventory and Inspection Program:** Updated section with relevant information and procedures, including revising wet weather inspections to be conducted from the land-side, and all reconnaissance inspections are recorded in Harbors AMS integrated with GIS.
- **Section A, 2.3.3 Site Assessment Program:** Revised the responsible party for the Illicit Discharge Detection and Elimination (IDDE) Program Site Assessments to include HAR-EE.

HAR-EE will be notified of any suspected illicit discharge.

- **Section A, 2.3.4 Enforcement:** The full scope of Harbors enforcement program is described in the ERP.
- **Section A, BMP Table 2-2 Illicit Discharge Detection and Elimination:**
 - Revised the evaluation metric for CD 16.c.ii, 16.d, 16.c.i.2, 16.c.ii and SWMP B.3 from reporting a number to percentage.
 - Revised the due date for CD 16.b.i, 16.b.iii, and SWMP B.4 from “begin within 30 days of the CD entry then annually” to “annually.” Also included HAR-EE as the responsible party in addition to HAR-O.
 - Revised the evaluation metric for CD 15.a.i and SWMP B.6.1 from “percentage of employees *receiving* stormwater awareness and pollution prevention *questionnaire*” to “percentage of employees *responding* to a stormwater awareness pollution prevention *survey*.” Removed the evaluation milestone 100% received.
 - Updated the responsible party in CD 15.b.i and SWMP B.6.1 to include HAR-O.
- **Section A, BMP Table 2-3 Construction Site Runoff Control Plan:**
 - Revised the evaluation metric for CD 17.b.iv, CD 17.b.i, and SWMP C from number to percentage and included HAR-EE as the responsible party.
 - Revised the due date for CD 17.b.i and SWMP C from annually to ongoing.
 - Updated evaluation metric for SWMP C, Section 6 from “percentage of contractors that receive Construction BMP Field Manual” to “Percentage of contractors provided with CSRPC Manual posted on Harbors Storm Water website.”
 - Revised the milestone for SWMP C, Section 5.2 from “increased from previous year (85% goal)” to “80%.”
- **Section A, 2.5.2 Retrofit of Construction Projects:** This section was updated to include relevant information and the project status.
- **Section A, BMP Table 2-4 Post-Construction Stormwater Management Program:**
 - Revised the activity, evaluation metric, milestones, due date, responsible party and output for CD 18.a.iv and SWMP 2.5.1 to reflect the current program activities.
 - Updated the responsible party for CD 18.b.i to include HAR-EE and removed the Post-Construction Project Database from the output column.
 - Revised the evaluation metric for CD 18.f.i from “number” to “percentage.”
 - Revised the evaluation metric for CD 18.b.i from “number” to “percentage” and revised “non-exempt” tenant projects to “regulated” tenant projects.
- **Section A, Table 2-5 Post-Construction Stormwater Management Compliance Checklist:** Updated checklist to include relevant information and program updates where appropriate.
- **Section A, Table 2-5 Pollution Prevention and Good Housekeeping Compliance Checklist:** Updated checklist to include relevant information and program updates where appropriate.
- **Section A, 2.8 SWMP Revisions:** Updated to include reasoning for the 2021 SWMP

update.

3.1.2.1 Attachment 1: Sign Location

- Updated the pollution prevention sign location map to show all new and existing sign locations in AMS.

3.1.2.2 Attachment 2: Tenant Questionnaire

- Updated the Tenant Questionnaire with a current version being utilized.

3.1.3 Section B

- **Section B, 5.0 Enforcement:** Provided an update about Harbors enforcement program including enforcement options and a full scope in the ERP.

3.1.3.1 Attachment 1: Tenant Inspection Manual

- Updated *the TIM* to include the documentation and recordkeeping using AMS, evolving tenant inspection procedure, revised inspection forms and risk-ranking criteria, modified Enforcement Section (5.0) to be consistent with the approved ERP, and newly-developed New Tenant Information Package and BMP fact sheets.

3.1.3.2 Attachment 2: Outfall Reconnaissance Inspection and Inventory Program

- Updated *the ORIIP* Manual to include the application of AMS, evolving reconnaissance procedures, modified Enforcement Section (4.0) to be consistent with the approved ERP, and most recent outfall inventory and location maps (which was originally included in Attachment 3 to SWMP).

3.1.3.3 Attachment 3: Enforcement Response Plan

- Added the approved *Enforcement Response Plan* to the SWMP that was prepared in accordance with the CD, the NPDES NGPC permits for Honolulu Harbor and Kalaeloa Barbers Point Harbor, and relevant sections of federal, state, and county laws, rules, and regulations.

3.1.3.4 Attachment 4: Employee Fact Sheet

- Updated the Employee Fact Sheets focusing on general pollution prevention.

3.1.3.5 Attachment 5: Employee Survey

- Updated with the most recent Employee Survey.

3.1.4 Section C

3.1.4.1 Attachment 1: Construction Site Runoff Control Program Manual

- Updated *the CSRCP* Manual to include the evolving construction procedures, slightly revised inspection checklist, improved training/outreach program, modified Enforcement Section (7.0) to be consistent with the approved ERP, links to CCH BMP Manual for Construction and Rules Relating to Water Quality, most recent Specifications on Temporary Water Pollution, Dust, and Erosion Control, and newly developed Construction and Post-Construction Program Brochures.

3.1.5 Section D

3.1.5.1 Attachment 1: Post-Construction Stormwater Management in New Development and Redevelopment Program Manual

- Updated *the Post-Construction Stormwater Management Manual* to include the evolving post-construction BMP selection and evaluation procedures, post-construction BMP inventory and recordkeeping using AMS, modified Enforcement Section (6.0) to be consistent with the approved ERP, a copy of CCH Stormwater BMP Guide for New and Redevelopment (dated July 2017), newly developed Construction and Post-Construction Program Brochures.

3.1.6 Section E

- **Section E, 3.1 Wash Areas:** Updated section to match current policies and procedures. Removed the USEPA Stormwater BMP for Municipal Vehicle and Equipment Washing. Rephrased language to clearly state washing is prohibited without obtaining consent from Harbors and following the acceptance of the washing application; a formal letter will be issued. The application and review process are reported in the ACR.

3.2 SWMP CORE PROGRESS EVALUATION

HDOT-Harbors continued to work with consultants to meet the requirements of the 2014 CD and the updated 2021 SWMP. Management continued their involvement to ensure proper implementation of the program.

The HDOT-Harbors education and outreach program is designed for HDOT-Harbors employees and tenants. The program increases the general awareness of impacts that different activities may have on stormwater runoff, and how BMPs, and post-construction BMPs can help minimize or mitigate those impacts.

All live trainings were conducted virtually due to the Coronavirus Disease 2019 (COVID-19) pandemic restrictions that continued through 2021. The HDOT-Harbors Division Annual Stormwater Pollution Prevention Awareness Training for Harbor Tenants was provided via one live virtual training and one online video through YouTube. Tenants were notified via email and certified letter to attend the training and to provide a completed survey and sign-in sheet to HDOT-Harbors Engineering Branch Environmental Section (HAR-EE) as proof of completion. On November 17, 2021, HDOT-Harbors participated in a statewide virtual Protect Our Water (POW) Conference which hosted approximately 500 attendees to discuss Stormwater Pollution Prevention Plan development; proper installation, maintenance, and inspection of construction BMPs; while also providing a review of policies, rules, and procedures (Figure 1).



Figure 1. Virtual Protect Our Water Conference

HDOT-Harbors continued its inspections of high, medium, and low risk tenants in 2021 and provided outreach and education before, during, and after the site visits.

HDOT-Harbors continued to implement the CSRCP. In 2021, HDOT-Harbors Engineering Branch (HAR-E) and associated consultants and contractors whose primary job duties are related to implementing this program were invited to attend HDOT-Harbors construction and post-construction training, which was conducted live during the POW virtual conference and became available online post-conference. HAR-EE continued to review and evaluate all projects from design through construction phases, as well as coordinate and inspect regulated construction sites.

HDOT-Harbors Oahu District (HAR-O) continued its work on pollution prevention and good housekeeping (P2/GH). Two rounds of semi-annual and four rounds of quarterly screening inspections were conducted for all accessible and “discretionary” hot spot storm drain inlets and trench drains in 2021, respectively. Follow-up stenciling and comprehensive cleaning were performed at all drain inlets and trench drains identified as requiring further attention by the screening inspectors.

HDOT-Harbors continued to use its GIS-integrated AMS (Figure 2) for record-keeping, workflow, and data management. This AMS was configured in 2016 to operate on the State of Hawaii server, allowing more HDOT-Harbors personnel to gain access and training. AMS related outreach and training efforts were conducted in 2021 for new hires. Two rounds of AMS workshops were conducted on June 18, 2021 and December 10, 2021. HDOT-Harbors Marine Cargo Specialists and Ground Maintenance crews continue to actively use AMS on computer and/or mobile devices to document work results and to report environmental issues found.

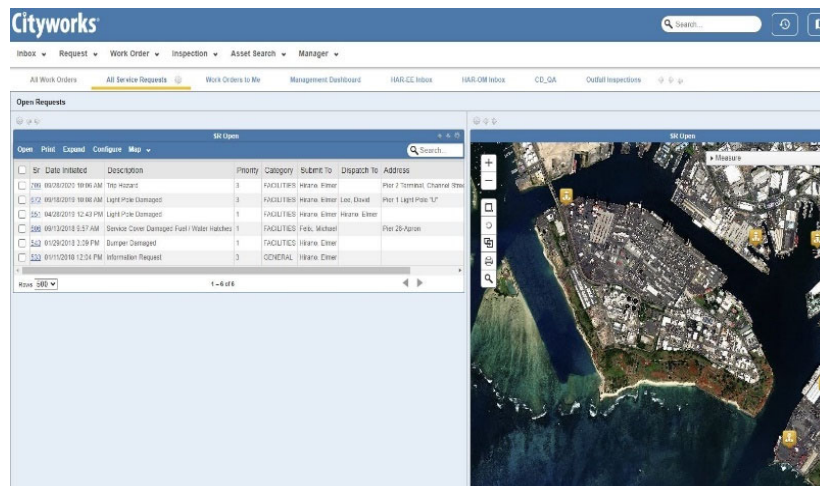


Figure 2. AMS

3.2.1 Environmental Compliance Audit

The third-party compliance audit for all six program elements of the small MS4 Permits issued to HDOT-Harbors was completed back in March 2020. The Program Element Audit Reports (PEAR) were included in the past ACRs.

3.2.2 Program Effectiveness

HDOT-Harbors has determined that the majority of the selected BMPs are appropriate to reduce the discharge of potential pollutants in the stormwater. The metrics detailed in Section 4 of this report were effective at tracking HDOT-Harbors stormwater compliance in 2021.

The training and inspection activities continuously helped tenants, consultants, and contractors identify areas that could potentially generate illicit discharges and properly control the sources to minimize potential pollutant discharges. Additionally, regular street sweeping continues to remove debris that would otherwise enter the HDOT-Harbors small MS4s and, subsequently, the receiving waters.

In 2021, regular storm drainage system inspection and cleaning events continued to ensure that HDOT-Harbors small MS4 functions properly during rain events. Over 21.37 tons of debris that could have been discharged to the adjacent harbors was removed. The small MS4 inspection log is included in Attachments 14 and 15a.

Street sweeping remains an important BMP to minimize debris from entering the small MS4 and adjacent harbor waters. Sweeping activities took place twice a week and as needed or requested by tenants in 2021. As a result, a total of 140.6 tons of debris were removed from the street sweeping and drain cleaning activities (Attachment 16).

Education and outreach efforts were continuously directed towards tenants, employees, and the public to promote stormwater awareness. These efforts were focused on preventing the

discharge of potential pollutants and debris from everyday activities and implementing source control related BMPs. In 2021, education and outreach efforts contributed to the reduction of debris which could be ended up entering the storm drains.

HDOT-Harbors employees and tenants are trained to be observant during their daily activities and to report suspected illicit discharges so that the potential sources of pollutants can be prevented or contained. In 2021, the number of suspected illicit discharges reported slightly increased from the previous year. This was likely due to facilities operating at a larger scale with an increasing number of employees returning to the office full time.

Table 3 below summarizes data regarding progress to reduce the discharge of potential pollutants.

Table 3. Status of BMPs				
MCM ¹ Description	BMP Applied ²	Parameter	Quantity	Does BMP Demonstrate a Direct Reduction in Pollutants?
P2/GH	Volunteer event debris removal or cleanup	Cigarette butts, trash, debris	N/A	Yes – pollutants would otherwise remain in the MS4
P2/GH	MS4 Cleaning	Debris	21.37 tons	Yes – pollutants would otherwise remain in MS4
P2/GH	Street Sweeping	Debris	39.86 tons	Yes – pollutants would otherwise discharge to the MS4
IDDE	Elimination of illicit discharges to MS4	Investigations related to MS4 discharges	13	Yes – illicit discharges reduced or eliminated
IDDE	Elimination of direct discharges to Harbor waters (non-MS4 discharges)	Investigations related to non-MS4 discharges	25	Yes – illicit discharges reduced
Notes ¹ MCM = Minimum Control Measure ² Response Action on MCM/resultant outcome				

3.2.3 Challenges and Proposed Modifications for 2022

The SWMP was updated in 2021 (Attachment 17) to account for program evolution which includes accomplishments and adjustments that have been incorporated into the plan. The BMPs that were considered to be either insufficient or outmoded in measuring the effectiveness of the program were updated to reflect current program processes or conditions.

Future revisions to the SWMP are anticipated to be completed in conjunction with the promulgation of the revised HAR § 11-55, Appendix K in 2022.

3.2.4 Consent Decree Timelines

The CD timelines (as of 12/31/2021) have been met. A letter requesting exiting the 2014 CD, together with the Termination Report was submitted to HDOH and USEPA in November 2021.

3.2.5 Water Quality Monitoring Data

Regular operation and maintenance of these permanent BMPs continued in 2021 to keep up their pollutant removal effectiveness. Based on the discussion of program effectiveness in Section 3.2.2, HDOT-Harbors has decided that water quality monitoring is not necessary at this time.

3.2.6 Stormwater Messages



HAR-EE continues to exercise best efforts to display the stormwater pollution prevention awareness message “*Mālama I Ke Awa Kai*, Protect Our Harbor Waters,” in all printed and electronic communication with tenants and during staff, tenant, or public trainings. To enhance the visibility, HDOT-Harbors has continued the use of a stormwater pollution prevention awareness logo consisting of the awareness message and a raindrop fish to promote responsible environmental behavior to protect harbor waters.

Additionally, to increase stormwater pollution prevention awareness, stainless steel medallions have been installed adjacent to storm drain inlets and other structures to remind HDOT-Harbors employees, tenants, and the public that all drains lead to the ocean without prior treatment. The medallions were installed in 2018 to replace paint-stenciling with an intention to decrease the re-stenciling efforts. Currently, they are replaced as



Figure 3. 2021 SWMP

needed.

Signs have been installed at visible public areas that include information about illicit discharges and the phone numbers (including stormwater hotline) for reporting. Based on the inspection and repair results from the past few years, HAR-EE assessed and determined that these sign inspections will be conducted biennially instead of annually. The next inspection will be conducted in 2022.

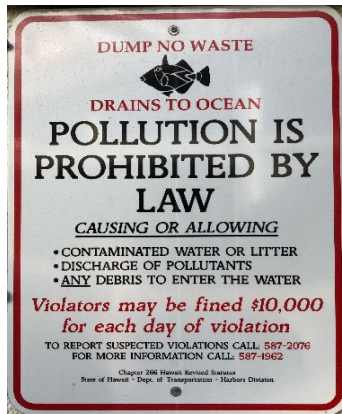


Figure 4. Pollution Prevention Sign

4 STORMWATER MINIMUM CONTROL MEASURES

HDOT-Harbors small MS4 permits are regulated by HAR § 11-55, Appendix K, which requires all permittees to develop, implement, and enforce a SWMP designed to reduce the discharge of pollutants from the permittees small MS4 system to the MEP, to protect water quality, and satisfy the water quality requirements of the CWA. HAR § 11-55 requires a SWMP to include the following six MCMs with implementation dates and rationales for each measure.

1. Public Education and Outreach;
2. Public Involvement and Participation;
3. Illicit Discharge Detection and Elimination;
4. Construction Site Runoff Control;
5. Post-Construction Stormwater Management in New Development and Re-Development; and,
6. Pollution Prevention and Good Housekeeping.

Appendix K of HAR § 11-55 also requires the permittee to develop “measurable goals” to gauge permit compliance and program effectiveness for each MCM identified above. The permittee shall select measurable goals using an integrated approach that fully addresses the requirements and intent of the MCM.

This section details how HDOT-Harbors has met the six requirements and measurable goals.

4.1 GENERAL PROGRAM REQUIREMENTS

The CD requires HDOT-Harbors to comply with all requirements of the CWA, as well as the terms and conditions of all applicable NPDES Permits, including the Hawaii Small MS4 General Permit.

Table 4 provides a summary describing HDOT-Harbors' General Program Requirements listed under the CD.


Table 4. General Program Requirements							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.5. Stockpile BMPs	HAR-EE / HAR-E Maintenance Section	By 11/5/14, develop and implement a plan for stockpile stabilization.	11/5/14	<ul style="list-style-type: none"> The stockpile stabilization plan was submitted to the HDOH and USEPA in 2014 and was approved in 2015. Stockpiles were stabilized with vegetation, soil sediment control, and berms. All stockpiles were inspected in 2021. The last inspection was conducted on 12/22/2021 (Attachment 13). No stockpile materials were removed in 2021. 		N/A	<p>Continue to maintain BMPs implemented.</p> <p>Re-purposing of the remaining Stockpile 2A materials as well as those from other KBPH stockpiles is currently being investigated for potential development projects. Soil stabilization will be applied to Stockpile 5 following further assessment.</p>

Table 4. General Program Requirements






MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.10. Office of Environmental Compliance	HDOT Administration	By 5/4/15, ensure: 1) Reports to Director of Transportation 2) Reorganize and hire manager. 3) Oversee compliance for DOT. 4) Perform program audits.	11/5/14	<ul style="list-style-type: none"> In 2016, the manager position of ENV was filled. This manager now oversees compliance for DOT. The audit plan was developed and implemented in 2017. Program audit of the last element on staffing, funding, organizational structure, availability of resources, and stormwater program sustainability audit was completed in March 2020. The 3rd-party compliance audit of all six program elements has been completed for the small MS4 Permits issued to HDOT-Harbors in March 2020. 		N/A	None.
CD.11.a. SWMP Modification	HAR-EE	By 2/3/15, modify the joint SWMP to comply with the CD and MS4 permits and post it on the HDOT-Harbors web page.	11/5/14	<ul style="list-style-type: none"> The SWMP was modified and posted on the HDOT-Harbors web page in February of 2015. Recent update to the SWMP were completed in 2021 and posted on the HDOT-Harbors web page. 		N/A	Complete future modifications to the SWMP in conjunction with revised HAR § 11-55, Appendix K Permit, if necessary.

Table 4. General Program Requirements

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.19.a. Enforcement Response Plan (ERP)	HAR-E Harbors Division, Property Management Section (HAR-PM)	By 12/5/14, submit an ERP to DOH and USEPA.	11/5/14	<ul style="list-style-type: none"> • A revised draft of the ERP was submitted to the USEPA on August 5, 2015, but was not approved. • The ERP was revised and submitted to the USEPA in May 2020, and approved on December 22, 2021 via email. 		N/A	Implement where necessary.
CD.19.b. Memorandum of Agreement (MOA)	AG	By 12/5/14, enter into a MOA with DOH.	11/5/14	The MOA with HDOH was signed by both parties and transmitted to the USEPA on May 26, 2015.		N/A	Implement where necessary.
CD.19.b. Authority to Issue Civil Fines	AG	By 12/31/14, use best efforts to obtain authority to issue civil fines.	11/5/14	The ERP was revised and submitted to the USEPA in May 2020.		N/A	Implement enforcement actions and penalties for construction contractors, tenants & third parties in accordance with the approved ERP.

4.2 PUBLIC EDUCATION AND OUTREACH

HAR § 11-55 Appendix K, requires the small MS4 permittee to provide public education and outreach. This public education program provides educational materials to users of the permittee's small MS4 and outreach activities emphasizing the following:

- A. Impacts of stormwater discharges on water bodies;
- B. Hazards associated with illicit discharges; and
- C. Measures that users of the permittee's small MS4 can take to reduce pollutants in stormwater runoff, including, but not limited to, minimizing fertilizer application, and practicing proper storage and disposal of chemicals and wastes.

Table 5 provides a summary describing HDOT-Harbors' public outreach and education program, including the MCM, milestones, BMP goals, and planned activities.

Table 5. Public Education and Outreach


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD 14.a.i. SWMP A.3.1.1 Awareness Message Integration	HAR-E	100% of tenant outreach and training materials featuring the stormwater pollution prevention message.	1/1/21	<ul style="list-style-type: none"> The stormwater pollution prevention message was revised in November 2018 from “<i>Mālama I Ke Kai</i>” to “<i>Mālama I Ke Awa Kai</i>” for accuracy on the Hawaiian translation of Protect our Harbor Waters. HAR-EE continues to exercise the best efforts to display the stormwater pollution prevention awareness message “<i>Mālama I Ke Awa Kai</i> - Protect Our Harbor Waters ” in all printed and electronic communication with tenants and during staff, tenant, or public trainings. A logo consisting of the message and the HDOT’s raindrop fish was designed to promote responsible environmental behavior. 		N/A	Continue to integrate message into all printed and electronic communication.

Table 5. Public Education and Outreach


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD 14.a.ii. SWMP A.3.1. Awareness Message Distribution	HAR-EE	Identify and implement no less than three forms of disseminating stormwater pollution prevention awareness information to tenants and the public.	1/1/21	<p>The stormwater message and logo has been included in at least five forms of information:</p> <ul style="list-style-type: none"> • Documents (SWMP, ACR). • Newspaper Advertisement (Attachment 1). • BMP Fact Sheets (Attachment 2a) • Reduce, Reuse, Recycle Brochure (Attachment 2b) • Construction and Post-Construction Brochures (Attachment 2c, 2d, and 2e) • New Tenant Welcome Brochure (Attachment 2f) • Tenant Training Notice (Attachment 3a). • Training Presentations (Tenant, Construction and Post-Construction, and IDDE) (Attachments 3b, 4a, and 6a). 		N/A	Continue to include message wherever beneficial.

Table 5. Public Education and Outreach



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.a.ii. SWMP A.3.1.3. Social Media	HAR-EE	Maintain a web-based media to disseminate stormwater pollution prevention awareness information.	1/1/21	<ul style="list-style-type: none"> The public and tenants are directed to visit information posted on HDOT-Harbors stormwater management web page, and report suspected illicit discharges to Harbor Traffic Control at 808-587-2076 (24/7) or Environmental Hotlines at 808-587-1962 (business hours). A new web site dedicated for HDOT-Harbors SWMP was created in 2019 to mirror the existing one with a customized web address reflecting the stormwater awareness message http://hidot.hawaii.gov/HDOT-Harbors/malamaikeawakai/ 		N/A	None.
CD 14.a.ii. SWMP A.3.1.4. Public Outreach Event	HAR-EE	Participate in the annual HDOT POW Conference or similar.	1/1/21	<ul style="list-style-type: none"> HDOT-Harbors participated in one event which was the Annual POW Conference on November 17, 2021. There were 180 visitors at the HDOT-Harbors virtual booth. 		N/A	Continue to participate in the annual HDOT Protect Our Water Conference or similar.

Table 5. Public Education and Outreach



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.a.ii.1) SWMP A.3.2.4. Tenant Training	HAR-EE	Ensure 80% of tenants participate in annual tenant stormwater training.	1/1/21	<ul style="list-style-type: none"> • A live virtual training in addition to the online stormwater training video was implemented in lieu of the live training sessions due to COVID-19 pandemic. The video was made available to tenants in January 2021 via YouTube and the live virtual training was conducted on August 6, 2021. (Attachments 3a, 3b, and 3c). • 92% of tenants attended this training (Attachment 3c). • Marisco achieved the Tenant Environmental Manager of the Year (TEMY) award in 2021 for continuing to go above and beyond in their environmental compliance efforts. 		N/A	Continue the efforts and increase the training participation rate through individual calls, visits, email reminder, etc.
SWMP A.3.2.4. Training Feedback	HAR-EE	Provide the percentage of positive feedback received.	1/1/21	<ul style="list-style-type: none"> • Based on the feedback forms received following the two training events, 89.35% of tenants gave positive feedback regarding the effectiveness and relativity of the training's content. • A summary of the tenant training feedback and completed surveys are in Attachment 3c. 		N/A	Continue to track training feedback and make improvements to training where feasible.

Table 5. Public Education and Outreach


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD 14.a.ii CD 14.a.iii SWMP A.3.1.2 Newspaper Advertisement	HAR-EE	Annually post an advertisement(s) in local newspaper(s) to the public about stormwater pollution controls and describe Harbors efforts to protect and sustain stormwater quality.	1/1/21	One newspaper advertisement highlighting stormwater pollution prevention awareness was placed in the Honolulu Star Advertiser on 10/22/2021. The newspaper advertisement describes HDOT-Harbors current efforts towards pollution prevention and how the public can help (Attachment 1).		N/A	Develop and publish one advertisement.
SWMP A.3.1.5. SIDR	HAR-EE HAR-O	Number of informational inquiries and reports received.	1/1/21	<ul style="list-style-type: none"> In 2021, HDOT-Harbors received 38 inquiries/reports, which is an increase from the 22 inquiries received in 2020 (Attachment 10). HDOT-Harbors reinforced reporting procedures in their annual IDDE training. 		N/A	Continue to track the number of informational reports received. Distribute SIDR pocket guides for HAR-O & HAR-E use.
SWMP A.3.1.5. Response to inquiries and reports within SIDR.	HAR-EE HAR-O	Duration from when call is received until response.	1/1/21	All inquiries were responded to within 24 hours.		N/A	Continue to respond to received inquiries.

Table 5. Public Education and Outreach




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.b.i. SWMP A.3.1.6. Update Webpage	HAR-EE Harbors Division, Management Information Systems (HAR-SI)	Ensure that web page remains useful and relevant.	1/1/21	The web page has been updated throughout 2021 to include updated SWMP, training materials, brochures, and BMP fliers. (http://hidot.Hawaii.gov/HDOT-Harbors/library/storm-water-management/ ; http://hidot.Hawaii.gov/HDOT-Harbors/malamaikeawakai/).		N/A	Continue to update the web page as needed.
CD.14.b.ii. SWMP A.3.1.6. Webpage Links	HAR-EE HAR-SI	Ensure links to Airports and Highways are included on the web page.	1/1/21	The links to the other HDOT Division websites are included on the HDOT-Harbors web page.		N/A	Maintain links.
CD.14.b.iii. SWMP A.3.1.6. Web page Message	HAR-EE HAR-SI	100% of web pages where stormwater awareness message is prominently displayed.	1/1/21	The stormwater message is prominently displayed on the HDOT-Harbors web page as well as 100% of stormwater educational materials.		N/A	Continue to display stormwater message.

Table 5. Public Education and Outreach





MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.b.iii. SWMP A.3.1.6. Web page Visitors	HAR-EE HAR-SI	Ensure the number of visitors to HDOT-Harbors stormwater management web page has increased from the previous year.	1/1/21	HDOT-Harbors received a total of 1,416 unique page views in 2021 which is slightly higher than the 1,187 unique page views in 2020. There were 1,737 web page views in 2021, which is higher than the 1,524 views in 2020.		N/A	Continue to promote web page through trainings and material handouts. Continue to track web page views.
CD.14.c.i. SWMP A.3.1.7. Stormwater Signs Installation	HAR-EE HAR-O	By 11/5/14, identify and install 50 locations that are suitable for signs.	11/5/14	<ul style="list-style-type: none"> Completed in 2014 and tracked in AMS. To date, 100% of signs have been installed in suitable areas. 		N/A	None.
CD.14.c.i. SWMP A.3.1.7. Stormwater Sign Evaluation	HAR-EE	Evaluate whether additional stormwater signs are necessary.	1/1/21	Signs are evaluated once every two years at Honolulu Harbor and Kalaeloa Barbers Point Harbor. Signs will be evaluated in 2022.		N/A	Evaluate the need for additional signs. Replace and repair missing or damaged signs.
CD.14.c.ii. SWMP A.3.1.7. Storm Drain Inlet Stencils	HAR-EE/ HAR-O	By 2/3/15, ensure 100% of storm drain inlets are stenciled.	2/3/15	<ul style="list-style-type: none"> 100% of accessible storm drain inlets and trench drains were stenciled by 2015. 		N/A	None.

Table 5. Public Education and Outreach



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.c.ii. SWMP A.3.1.7. Storm Drain Inlet Stencils	HAR-EE / HAR-O	Annually inspect 100% of stencils for legibility prior to the wet season and re-stencil within 60 days of the inspection as needed.	1/1/21	<ul style="list-style-type: none"> In 2021, HDOT-Harbors conducted an inspection of stencils simultaneously with the storm drain inspections (Attachment 15a and 15b). 100% of stenciled drains were inspected and 5.5% required re-stenciling. This is likely due to the installation of stainless-steel markers (medallions) since 2018. 		N/A	<p>Inspect stencils and re-stencil/re-label as necessary.</p> <p>Continue to install more durable stencils and markers as needed.</p>
CD.14.d.i. SWMP A.3.2.3. Tenant BMPs	HAR-EE	Annually, ensure that 100% of information on BMPs is available in fact sheets.	1/1/21	<p>The BMP Fact Sheets were updated in 2021. A list of updated tenant BMPs is available on the HDOT-Harbors web page:</p> <ul style="list-style-type: none"> http://hidot.Hawaii.gov/HDO T-Harbors/library/storm-water-management/ http://hidot.Hawaii.gov/HDO T-Harbors/malamaikeawakai/ 		N/A	Update and distribute BMP flyers as necessary.

Table 5. Public Education and Outreach




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.d.ii. SWMP A.3.2.1. Tenant Lease Agreements	HAR-PM	Ensure 100% of new / renewed tenant leases include language requiring BMPs.	1/1/21	<ul style="list-style-type: none"> Lease agreement and revocable permit language formatting were updated back in 2015 to include requirements on stormwater BMPs. 100% of new/renewed tenant leases and revocable permits have incorporated the updated language. 		N/A	Continue to use the new format.
CD.14.d.ii SWMP A.3.3.1 Vessel BMPs	HAR-O	Develop BMPs for Vessel Operators and make them available on the web page or as print media.	11/5/14	<ul style="list-style-type: none"> A BMP flier is available on the HDOT-Harbors web page titled "BMPs for Small Vessel Maintenance Activities." HDOT-Harbors will continue to work on translating this BMP into other foreign languages as necessary, to provide outreach to non-English speaking users. 		N/A	Distribute updated flyers. Continue to evaluate and translate this BMP into foreign languages, as necessary.
CD.14.e.i. SWMP A.3.2.2. Tenant Inventory	HAR-EE / HAR-PM	Ensure that 100% of tenants are accurately listed in the electronic inventory based upon most recent inspection.	1/1/21	<ul style="list-style-type: none"> HDOT-Harbors continued to maintain their electronic tenant inventory. 100% of tenants are included in Cityworks. 		N/A	Continue to update and maintain tenant inventory data to GIS-integrated AMS.

Table 5. Public Education and Outreach





MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.f.i. & ii. SWMP A.3.2.4. Tenant Survey	HAR-EE	Ensure at least 80% of tenants attend the annual training. Annually, provide a questionnaire to tenants and have 60% of tenants respond. Use data from quiz to update training materials.	1/1/21	<ul style="list-style-type: none"> Approximately 100% of tenants who attended or viewed the annual training completed a questionnaire following self-scheduled tenant training events. A summary of the results and the hard copy questionnaire are included in Attachment 3c. The most commonly missed question (#2) was relating to suspected illicit discharge reporting contacts. 		N/A	Update the training quiz and distribute to tenants.
CD.14.g. SWMP A.3.2.3.-4. Tenant Educational Materials	HAR-EE	Twice per year, distribute educational materials to tenants.	1/1/21	Educational materials that were distributed in 2021 include handouts provided with the annual Tenant Stormwater Awareness Training notification email and certified mail (Attachment 3a) and handouts available at the annual POW Conference on 11/17/2021.		N/A	Distribute materials twice per year.

Table 5. Public Education and Outreach

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.14.h.i. New Tenant Information Package	HAR-EE	Develop and update as necessary the New Tenant Information Package to include stormwater requirements.	11/5/14	<ul style="list-style-type: none"> The new tenant information package is available on the HDOT-Harbors web page and is also provided to the new tenants directly. The new tenant welcome brochure was updated in 2021 (Attachment 2f). 		N/A	Distribute information to new tenants.
CD.14.h.ii. TIM Section 2 Inspect New Tenants	HAR-EE	Conduct an initial inspection of 100% of new tenants within three months of the tenant occupying a Harbor's space.	1/1/21	Seven new/initial inspection were conducted in 2021, which represents 100% of new tenants formally identified by HAR-PM (Labeled as "new" under the "Inspection Type" column in Attachment 8).		N/A	Inspect new tenants as applicable.

4.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

HAR § 11-55, Appendix K requires the small MS4 permittee to create an IDDE program. The program implements and enforces methods to detect and eliminate illicit discharges that, at a minimum, include the following:

- A. Establish rules, ordinances, or other regulatory mechanism, including enforcement procedures and actions, that prohibit non-stormwater discharges, Section 1 of HAR § 11-55, Appendix K lists discharges that do not cause or contribute to any violations of water quality standards, into the permittee's small MS4 system;
- B. Procedures to detect and eliminate illicit discharges as defined in Code of Federal Regulations 40 Section 122.26(b) (2); and
- C. Compile a list of non-stormwater discharges or flows that are considered to be significant contributors of pollutants to the system, and measures to prevent these discharges into the permittee's small MS4, or reduce the amount of pollutants in these discharges.

Table 6 summarizes data regarding HDOT-Harbors' IDDE program, MCMs, BMPs, goals, milestones, and planned activities.


Table 6. Illicit Discharge Detection and Elimination Program							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.16.a. Illicit Discharge Definition	HAR-EE	By 11/5/14, promulgate a definition of illicit discharge with examples.	11/5/14	<ul style="list-style-type: none">Definition included in SWMP and provided in all training presentations, including tenant/employee stormwater general pollution prevention awareness, construction and post-construction, tenant inspector, ORIIP, and IDDE.Definition of illicit discharge: "A non-stormwater discharge that poses a risk to the environment."		N/A	Continue to communicate definition.

Table 6. Illicit Discharge Detection and Elimination Program




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.16.b.i. & iii. SWMP B.4. Tenant Site Assessments	HAR-EE, HAR-O, HAR-PM	Annually, conduct site assessments in high-risk areas and implement enforcement response plan where necessary.	1/1/21	<ul style="list-style-type: none"> • HAR-O personnel and HAR-PM have been informed that they should remain vigilant during daily activities in harbor areas for suspected illicit discharges. • HAR-EE and consultants' assessed sites for illicit discharges during tenant, construction, and outfall inspections. Refer to those items for additional data. • There were no enforcement actions as a result of site assessments in 2021. 		N/A	Update IDDE and tenant training and continue to conduct site assessments.
CD.16.b.ii. SWMP B.4. Outreach Activities	HAR-EE	Conduct outreach during site assessments and identify areas that may need signs.	1/1/21	<ul style="list-style-type: none"> • HDOT-Harbors continued to provide verbal outreach during site assessments and other activities. • No areas required new sign installation in 2021. 		N/A	Continue to conduct outreach activities.
CD.16.c.i. SWMP B.3. ORIIP Section 2 Outfall Prioritization	HAR-EE	Annually, reprioritize outfalls.	1/1/21	One outfall was inspected based on the outfall prioritization in 2021.		N/A	Re-prioritize outfalls based on ORI.

Table 6. Illicit Discharge Detection and Elimination Program




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.16.c.i. SWMP B.3. ORIIP Section 2 Outfall Inspections	HAR-EE	Inspect outfalls according to their risk ranking.	1/1/21	<ul style="list-style-type: none"> Dry weather ORI report is found in Attachment 9a. Wet weather ORI report is found in Attachment 9b. 		N/A	<p>Conduct dry weather reconnaissance of all outfalls.</p> <p>Conduct wet weather reconnaissance.</p>
CD.16.c.ii. & CD.16.d. SWMP B.3 ORIIP Section 3.3 Dry Weather Illicit Discharges	HAR-EE	Percentage of illicit discharges identified during dry weather flows are properly addressed.	1/1/21	Outfall reconnaissance conducted during dry weather revealed no illicit discharges.		N/A	Continue to address illicit discharges, if any.
CD.16.c.i.2. & CD.16.c.ii. SWMP B.3 ORIIP Section 3.4 Wet Weather BMP Improvements	HAR-EE	Percentage of BMPs identified during wet weather ORI as needing improvement are properly addressed.	1/1/21	<ul style="list-style-type: none"> The wet weather reconnaissance was conducted for outfalls adjacent to a NPDES NOI-C Permit regulated construction area at Piers 41 & 42 on January 25, 2021. Suspected illicit discharges were observed at several outfalls (Attachment 9b). Upon notification, HDOT-Harbors Contractor responded right away and repaired the BMPs. 		N/A	Continue to address BMPs that need improvement.

Table 6. Illicit Discharge Detection and Elimination Program



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.16.d. SWMP B Illicit Discharge Tracking and Elimination	HAR-EE	Identify and take necessary actions to stop the source of all illicit discharges.	1/1/21	<ul style="list-style-type: none"> • There were no illicit discharges identified from tenant facilities. • HAR-EE assisted with resolving 38 reports of miscellaneous discharges when requested (Attachment 10). 		N/A	Investigate illicit discharges where observed.
CD.16.e.i. TIM Section 4.3 Tenant Risk Ranking	HAR-EE HAR-PM	Annually ensure that all tenants have been risk ranked according to the TIM.	1/1/21	<ul style="list-style-type: none"> • An inventory of tenant inspections and their risk rankings are included in Attachment 8. • There are 43 low ranked tenant sites, 16 medium ranked tenant sites and 3 high ranked tenant sites for a total of 62 risk ranked tenant sites for 2021. 		N/A	Update risk ranking as necessary.

Table 6. Illicit Discharge Detection and Elimination Program




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.16.e.ii Routine Tenant Inspections	HAR-EE HAR-PM	Conduct tenant inspections / site reconnaissance in accordance with risk ranking and TIM.	1/1/21	<ul style="list-style-type: none"> In 2021, a total of 62 routine/recurring tenant inspections and site reconnaissance were conducted. This accounts for 100% of tenants inspected in accordance with the current risk ranking and TIM. Outreach materials were provided during these inspections and tenants were also instructed to visit the HDOT-Harbors web page. 		N/A	Continue to conduct inspections as required by risk ranking.
CD.16.e.iii. Site Reconnaissance Follow-up Inspections	HAR-EE HAR-PM	Percentage of follow-up inspections to the site reconnaissance are completed following a substantive change to a facility's operations, size, or activities within 30 days.	1/1/21	<ul style="list-style-type: none"> There were no major changes to facility operations, size or activities in 2021. One follow-up inspection was needed after conducting the routine inspection. 		N/A	Continue to conduct follow-up inspections as necessary.
SWMP B.2. TIM. Illicit Discharge Follow-up Inspections	HAR-EE	Percentage of follow-up inspections for illicit discharges are completed within 7 days of discovery.	1/1/21	100% of follow-up inspections for illicit discharges were completed within seven days of discovery (Attachment 10).		N/A	Continue to conduct follow-up inspections as necessary.

Table 6. Illicit Discharge Detection and Elimination Program



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
SWMP B.2. TIM. Compliant Follow-up Inspections	HAR-EE	Percentage of follow-up inspections are completed the next working day after receipt of a compliant.	1/1/21	There were no complaints received in 2021.		N/A	Continue to conduct follow-up inspections as necessary.
CD.15.a.i. SWMP B.6.1. Employee Awareness Training	HAR-EE HAR-O	Annual percentage of employees receive stormwater awareness and pollution prevention survey. Ensure that 80% of employees respond to the survey.	1/1/21	<ul style="list-style-type: none"> • HDOT-Harbors created a survey via online Google Forms. 93.42% of HDOT-Harbors employees completed the educational survey and feedback was positive for the online platform. A copy of the survey and summary results are included in Attachment 5b. • Although the majority received very high scores, the most commonly missed question (#3) related to suspected illicit discharge reporting. 		N/A	Evaluate the feedback and results from previous year and update educational materials to employees and conduct another survey.

Table 6. Illicit Discharge Detection and Elimination Program




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.15.a.ii. SWMP B.6.1. Employee Education	HAR-EE HAR-O	Percentage of employees receive information about stormwater pollution prevention.	1/1/21	Handouts and informational email were distributed to HDOT-Harbors employees to provide enhanced general awareness on stormwater management and improving general housekeeping (Attachment 5a).		N/A	Continue to distribute educational material.
CD.15.b.i. Illicit Discharge Detection and Elimination (IDDE) Program Training	HAR-EE HAR-O	Annual percentage of Marine Cargo Specialists, Police, and Grounds Supervisors on IDDE procedures.	1/1/21	<ul style="list-style-type: none"> • In 2021, due to the continued onset of COVID-19, IDDE training was provided to Marine cargo specialists, Harbor police, and grounds supervisors via online training video (Attachment 6a). Additionally, all HDOT-Harbors employees were outreached via email on reporting suspected illicit discharges in harbor areas when observed. • The presentation slides and a summary of completed training quizzes are included in Attachments 6a and 6b, respectively. • 100% of relevant HDOT-Harbors employees trained in 2021. 		N/A	Continue to train on IDDE.

Table 6. Illicit Discharge Detection and Elimination Program							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities 2022
CD.15.b.ii. & iii. SWMP B.6.2. &3. Inspector Training	HAR-EE	Percentage of inspectors have received tenant and/or Outfall Reconnaissance Inventory (ORI) training.	1/1/21	There was one new inspector that required training in 2021 (Attachment 7a & 7b).		N/A	Provide training to any new inspectors.

4.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

HAR § 11-55, Appendix K requires the small MS4 permittee to develop, implement, and enforce a program to reduce pollutants in stormwater runoff entering the permittee's small MS4 system from construction activities disturbing one acre or more. Included are construction activities less than one acre that are part of a larger common plan of development or sale that would disturb one acre or more. Program priorities, includes:

- A. Established rules, ordinances, or other regulatory mechanism, including enforcement procedures and actions, that require erosion and sediment controls;
- B. Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
- C. Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- D. Procedures for site plan reviews which incorporate consideration of potential water quality impacts;
- E. Procedures for receipt and consideration of information submitted by the public; and
- F. Procedures for site inspection and enforcement of control measures.

Table 7 provides information about the construction site runoff controls, including MCMs, BMPs, goals, milestones, and planned activities.


Table 7. Construction Site Stormwater Runoff Control							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.17.a. City and County of Honolulu BMPs	HAR-EE	Ensure that CCH BMPs are implemented for construction activities, where applicable.	11/5/14	<ul style="list-style-type: none">The CCH BMPs are referenced in the construction manual.Further, during plan reviews and inspections, construction sites are evaluated to ensure they are following the CCH construction BMP requirements when applicable.		N/A	Continue implementing CCH BMPs.

Table 7. Construction Site Stormwater Runoff Control



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.17.b.i. SWMP C – CSRCP Inspections	HAR-EE / Construction Managers	Percentage of construction inspections and enforcement actions are entered in a database.	1/1/21	<ul style="list-style-type: none"> The construction inspection inventory is included in Attachment 11. There were 10 non-exempt active sites and 70 inspections completed in 2021. There were no enforcement actions other than findings and recommendations documented in the inspection checklist, the majority of which were addressed during or by the next round of inspection. 		N/A	Continue tracking construction inspections and enforcement.
CD.17.b.ii. Temporary Erosion and Sediment Control Inspector	HAR-EE / Personnel Office	By 11/5/14, assign one temp and full-time position whose duties will include sediment and erosion control.	11/5/14	A HDOT-Harbors engineer is currently assigned to this position.		N/A	Inspector will continue to perform duties relating to temporary erosion and sediment control measures.

Table 7. Construction Site Stormwater Runoff Control




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.17.b.iii. Permanent Erosion and Sediment Control Inspector	HAR-EE / Personnel Office	By 12/31/15, establish a permanent erosion and sediment control position and utilize consultants.	11/5/14	A permanent position for Erosion and Sediment Control Inspector was filled back in 2017.		N/A	None.
CD.17.b.iv. SWMP C – CSRPC Construction Plan Reviews	HAR-EE / Engineering Project Managers	Percentage of construction projects for environmental requirements per the CSRPC.	1/1/21	A total of 18 tenant projects and 26 HDOT-Harbors projects were reviewed in 2021 (Attachments 12a and 12b), which represents 100% of projects requiring environmental review.		N/A	Review construction plans.
SWMP C – CSRPC Review Checklist	HAR-EE	Percentage of projects are reviewed using the Construction Site Design Review Checklist.	1/1/21	100% of the NOI-C regulated projects reviewed are required to use the Construction Site Design Review Checklist.		N/A	Continue to review form where applicable.

Table 7. Construction Site Stormwater Runoff Control




MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
SWMP C – CSRPC Less Than One Acre Forms	HAR-EE	Percentage of non-exempt projects that are less than one acre have submitted the form.	1/1/21	<ul style="list-style-type: none"> 6 HDOT-Harbors projects were considered non-exempt and 4 were regulated by NPDES NOI-C Permit (Attachment 12a). 8 reviewed tenant projects were considered non-exempt and 2 were regulated by NPDES NOI-C Permit (Attachment 12b). 100% of non-exempt projects submitted the form. 		N/A	Continue to review form where applicable.
SWMP C – CSRPC Review Documents	HAR-EE	Percentage of SWPPPs, NOIs, and discharge permits have been reviewed.	1/1/21	100% of project supporting documents are reviewed as a part of the standard review process.		N/A	Continue to review where applicable.
SWMP C – CSRPC Section 5.1	HAR-EE	Percentage of contractors receive the Construction BMP Field Manual.	1/1/21	100% of contractors were provided with access to the BMP field manual on HDOT-Harbors' web page.		N/A	Maintain BMPs on web page.

Table 7. Construction Site Stormwater Runoff Control



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.15.c. & d. SWMP C – CSRPC Section 5.1 Construction and Post-Construction Training	HAR-EE	Percentage of staff whose duties are related to construction or post-construction are trained by an instructor who is approved by USEPA and HDOH.	1/1/21	<ul style="list-style-type: none"> Construction and post-construction trainings were provided to engineers, consultants, contractors, and inspectors on 11/17/2021 during the annual POW Conference and via online video on YouTube. (Attachment 4a) As a result, a total of 160 people were trained, which exceeds 100% of the required individuals. Completed quizzes and surveys are included in Attachment 4b. 		N/A	Conduct annual training.
SWMP C – CSRPC Section 5 Construction Training Materials	HAR-EE	Update training materials to reflect information about most frequently missed question(s) from the past year.	1/1/21	The most commonly missed question (#5) was relating to nonpoint source pollutants. The second most commonly missed question (#6) was relating to when sedimented tracked onto roads must be cleaned by (Attachment 4b).		N/A	Update training to highlight the most commonly missed questions.

Table 7. Construction Site Stormwater Runoff Control

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
SWMP C – CSRPC Section 5.2	HAR-EE	At least 80% of attendees provide positive feedback about the training.	1/1/21	Survey results from 2021 indicated that training participants found the training material somewhat relevant and useful with an average of 86.6% positive feedback (Attachment 4b).		N/A	Continue to provide surveys to trainees.

4.5 POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

HAR § 11-55, Appendix K requires the small MS4 permittee to develop, implement, and enforce a program to reduce pollutants in stormwater runoff entering the permittee's small MS4 system from new development and redevelopment projects that disturb up to one acre. Included are construction sites less than one acre that are part of a large common plan of development or sale that would disturb one acre or more. The program includes the following:

- A. Establish rules, ordinances, or other regulatory mechanisms, including enforcement procedures and actions, that address post-construction runoff from new development and redevelopment projects.
- B. Structural and/or non-structural BMPs to minimize water quality impacts and attempt to maintain predevelopment runoff conditions; and
- C. Procedures for long-term O&M of BMPs.

Table 8 provides information about HDOT-Harbors post-construction stormwater management activities in new development and redevelopment projects, including MCMs, BMPs, goals, milestones, and planned activities.


Table 8. Post-Construction Stormwater Management in New Development and Redevelopment							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.a.i.,- iii. SWMP 2.5.1. Retrofit Project Inventory	HAR-EE	By 5/4/15, create an inventory of construction projects from 5/19/03 and rank them according to retrofit potential.	11/5/14	An inventory of projects was completed and evaluated for retrofit potential in 2015.		N/A	None.

Table 8. Post-Construction Stormwater Management in New Development and Redevelopment


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.a.iii. Retrofit Feasibility Scope	HAR-EE	By 8/2/15, draft a scope of the retrofit feasibility study and submit it to USEPA and DOH for approval.	11/5/14	<ul style="list-style-type: none"> The Retrofit Feasibility Study Scope was submitted to USEPA in early August 2015. The USEPA responded via letter dated December 3, 2015, that they required additional details. The USEPA approved the revised study outline on March 14, 2015. The USEPA approved the revised study approach on April 19, 2016. The USEPA approved the revised study scope in August 2016. On April 11, 2017 the Post Construction BMP Retrofit Feasibility Study was submitted to USEPA. 		N/A	None.

Table 8. Post-Construction Stormwater Management in New Development and Redevelopment



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.a.iii. SWMP E Final Retrofit Study	HAR-EE	240 days after USEPA and DOH's approval, complete the final retrofit study.	4/31/17	<ul style="list-style-type: none"> The Post-Construction BMP Retrofit Feasibility Study was performed by a HDOT-Harbors environmental engineering consultant (Weston Solutions, Inc.) and submitted to the USEPA in 2017. Three proposed permanent BMP (PBMP) retrofit project sites were included in the submittal. The USEPA and the HDOH approved the Feasibility Study on June 19, 2017. 		N/A	None.
CD.18.a.iv. SWMP 2.5.2. Retrofit Construction	HAR-E	Four years after approval of the Retrofit Feasibility Study, the construction will commence for the three highest ranked projects.	6/19/17	<ul style="list-style-type: none"> Potential pollutants of concern were identified and effective permanent BMPs for the three approved project sites at Piers 31, 51 and 52 have been recommended. Notice to Proceed letter dated June 8, 2021, was issued for this drain retrofit construction project. 		N/A	Complete the retrofit construction project

Table 8. Post-Construction Stormwater Management in New Development and Redevelopment





MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.b.i. Permanent BMP Plan Review	HAR-EE	Percentage of regulated projects reviewed in the design phase for BMPs using the using the <i>Post-Construction BMP Plan Checklist</i> .	1/1/21	The Post-Construction BMP Plan Checklist was used to evaluate 100% of the regulated projects (Attachments 12a and 12b).		N/A	Continue to use the Post-Construction BMP Plan Checklist for plan review on applicable projects.
CD.18.c. BMP Standards	HAR-EE	Adopt technical standards that govern PBMPs.	11/5/14	HDOT-Harbors continuously adopted the CCH BMPs in the 2021 SWMP.		Completed	None
CD.18.f.i. Harbors Project O&M Documents	HAR-E Construction Section / HAR-EE	Percentage of HDOT-Harbors projects with PBMPs have an O&M Plan, which was reviewed.	1/1/21	100% of HDOT-Harbors projects with permanent post-construction BMPs have an O&M plan, where applicable, and ongoing maintenance.		N/A	Continue to review plans for permanent BMPs.
CD.18.f.i. Tenant Project PBMP Maintenance	HAR-PM / HAR-EE	Percentage of tenant projects with PBMPs have updated leases requiring an O&M plan.	1/1/21	<ul style="list-style-type: none"> All projects with permanent BMPs have an O&M Plan. 100% of tenant projects with PBMPs have O&M plans or have adopted one from the manufacturer(s). 		N/A	Update leases (when applicable) for tenants with permanent BMPs in include requirements for an O&M plan.

Table 8. Post-Construction Stormwater Management in New Development and Redevelopment





MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.f.ii. PBMP Inspections by Tenants	HAR-EE / HAR-PM/ Tenants	Percentage of required annual PBMP inspections conducted by tenants and reported to HDOT-Harbors.	1/1/21	<ul style="list-style-type: none"> 100% of required PBMP inspections are conducted by tenants and reported to HDOT-Harbors. UHMC performs maintenance on the PBMPs at Pier 35 as part of their lease agreement (Attachment 14). 		N/A	Continue to ensure that tenants required to maintain PBMPs submit annual reports to HDOT-Harbors.
CD.18.d.& g. PBMP Inspections by HDOT-Harbors	HAR-EE / Construction Managers	<p>Percentage of PBMP inspections prior to, during, and upon completion of permanent BMP installation.</p> <p>Once installed, conduct annual inspections and administer enforcement actions where necessary.</p>	1/1/21	<ul style="list-style-type: none"> Two rounds of permanent BMP inspections were conducted on 1/21/2021 and 8/31/2021. These inspections are conducted in conjunction with the MS4 inspections (Attachment 15a). Starting in 2021, PBMP maintenance is now conducted biennially since the container yard is currently not in operation. No enforcement actions were necessary. 		N/A	Continue inspections where necessary.
CD 18.g.ii. Enforcement Records	HAR-EE	Percentage of enforcement actions are recorded in the project database.	1/1/21	There were no enforcement actions relating to permanent BMPs in 2021.		N/A	Record enforcement as necessary.

Table 8. Post-Construction Stormwater Management in New Development and Redevelopment

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.18.e. Permanent BMP Database	HAR-EE	Percentage of post-construction BMP inspections are included in a database compatible with GIS.	1/1/21	100% of PBMP inspections were recorded in AMS (Attachments 14 and 15a).		N/A	Update the inventory as necessary.

4.6 POLLUTION PREVENTION AND GOOD HOUSEKEEPING

HAR § 11-55, Appendix K requires the small MS4 permittee to develop a P2/GH program that will implement and enforce an O&M program to prevent and reduce stormwater pollution from activities, including, but not limited to, park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance that, at a minimum, includes the following:

- A. Good housekeeping and other control measures; and
- B. Employee and contractor training on good housekeeping practices to ensure that good housekeeping measures and BMP practices are properly implemented.

Table 9 provides information about the P2/GH program, including MCMs, BMPs, goals, milestones, and planned activities.


Table 9. Pollution Prevention and Good Housekeeping							
MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.20. Storm Sewer System Operation and Maintenance	HAR-O & HAR-E	By 12/5/14, submit a SSS O&MP Manual to HDOH and USEPA.	11/5/14	<ul style="list-style-type: none">Completed.HDOT-Harbors submitted a revised SSS O&MP Manual that was accepted by HDOH in 2017.		N/A	None

Table 9. Pollution Prevention and Good Housekeeping


MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.20.a. Storm Sewer System Mapping	HAR-EE / HAR-EP	Within 180 days of United States Army Corps of Engineers (USACE) development of a GIS layer create a map that identifies all storm drainage features.	1/1/15	<ul style="list-style-type: none"> Complete. In 2015, the USACE continued to add and refine storm drainage map features. Additionally, HDOT-Harbors environmental engineering consultant (Weston Solutions, Inc.) conducted field work (kayak surveys, closed circuit TV surveys and diving surveys) in November and December 2015 to fill in and correct 'data gaps' that remained in the original USACE version. 		Update storm drainage maps as necessary.	Update storm drainage map as needed with new project information and other findings from field personnel and other sources.

Table 9. Pollution Prevention and Good Housekeeping



MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.20.b. AMS	HAR-EE / HAR-EP	Within 180 days of USACE map completion, implement an AMS.	11/5/14	<ul style="list-style-type: none"> In 2015, HDOT-Harbors contracted with an AMS consultant team to install, configure, demonstrate, test and deploy a cloud-based, GIS-centric AMS for HDOT-Harbors stormwater system assets at Honolulu Harbor and Kalaeloa Barbers Point Harbor. There were about 70 active <i>Cityworks</i>® users from HDOT-Harbors employees with essential roles in stormwater O&M and management since 2016. 		N/A	Update Cityworks AMS software when prompted by vendor (Azteca Cityworks).
CD.20.c. Storm Drain Inspections	HAR-O	<p>Percentage of accessible features specified in the SS O&M Plan that were cleaned.</p> <p>Percentage of features recorded in database.</p>	1/1/21	<ul style="list-style-type: none"> 100% of accessible storm drain inlets and trench drains were inspected and cleaned in 2021 (Attachment 15a & 15b). 100% of inspection findings and cleaning results were recorded in the AMS. 		N/A	Continue screening and recording inspections of all storm drains.

Table 9. Pollution Prevention and Good Housekeeping





MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
CD.20.d. Storm Drain Cleaning	HAR-O	By 8/2/15, clean all inlets, pipes, and outfalls. Then ensure structures are cleaned at least every five years and more frequently for “hot spots.” Percentage of hot spots identified where BMPs were implemented or modified.	1/1/21	<ul style="list-style-type: none"> Accessible drainage features were cleaned in 2021 when needed. Approximately 21.37 tons of debris were removed from the cleaning activities. 		N/A	Schedule and clean storm drains found to contain debris during screening and comprehensive inspections. Schedule cleaning in accordance with the SSS O&M Manual provisions.
CD.20.d.ii. Rail Track Cleaning	Kalaeloa Barbers Point Harbor Tenants / HAR-OCB	Ensure that tenants develop and implement a cleaning schedule for the rail tracks.	1/1/21	The District personnel ensure that the tenants have regularly completed rail track cleaning after each offloading operation to minimize coal dust and other aggregate materials from accumulating inside.		N/A	Ensure that tenants continue to clean rails.
SWMP BMP 7-2. Wash Racks	HAR-EE	Percentage of washing activities that have submitted applications for approval.	1/1/21	No wash application was received for review & approval in 2021.		N/A	Continue to review applications as received.

Table 9. Pollution Prevention and Good Housekeeping

MCM/BMP Description	Responsible Dept. / Section	BMP Applied/ Measurable Goal(s)	BMP Start Date	Permit Year 19 Milestones/Progress on Goal(s)	Completed in 2021?	New or Revised Goal	Planned Activities for 2022
SWMP BMP 7-2. Dry Wells	HAR-EE	Percentage of applications for dry wells and/or infiltration sinks that were reviewed.	1/1/21	No applications were received for reviewed in 2021.		N/A	Continue to review applications as received.

5 PROGRAM OUTPUTS AND ACCOMPLISHMENTS

5.1 MS4 PROGRAM EXPENSES

Program expenditures include the costs of several consultant contracts as well as an estimate of time spent by HDOT-Harbors employees, AG and ENV support to ensure compliance with the conditions of the CD and the NPDES permit. Total expenditures in 2021 were less than the previous year. Overall, funds expended in 2021 met current needs. Table 10 provides a summary of the MS4 program expenses.

Table 10. MS4 Program Expenses	
Item	Response
Office of Environmental Compliance created/staffed	Yes
Annual program budget/expenditures* ('Best efforts' estimates of 2021 expenditures)	
• Public Education and Outreach & Public Participation and Involvement program expenditures	\$80,763
• Illicit Discharge Detection and Elimination Program expenditures	\$203,215
• Construction Site Runoff Control expenditures	\$162,600
• Post-Construction Stormwater Management in New Development and Re-development programs expenditures**	\$56,500
• P2/GH BMP program expenditures	\$669,839
• General Permit Compliance expenditures	\$144,501
• Program Total Expenditures	\$1,317,418
Funding mechanisms(s) - (Routine Maintenance Fund, Special Maintenance, Major Maintenance, Service Project, Equipment Acquisition, Capital Improvement Project (CIP))	Routine and Special Maintenance Funds, CIP
Notes:	
Data is from the 2021 calendar year.	
*Expenditures from HDOT-Harbors employees have been approximately based on the estimated percentage of time that they worked on stormwater related tasks.	
**Permanent Post-Construction BMP plan checklist reviews and associated inspections are accounted for under the Construction Site Runoff Control category since they are completed in conjunction with construction related tasks.	

Figure 5 shows \$669,839 (51%) of the total expenditures for 2021 were for P2/GH BMP program expenditures. The IDDE program was the second-highest expense at \$203,215 (15%). The Construction program was third most expensive at \$162,600 (12%). The General Permit Compliance cost \$144,500 (11%) of the total budget, the Public Education/Involvement program cost \$80,763 (6%), and the Post-Construction program cost \$56,500 (4%).

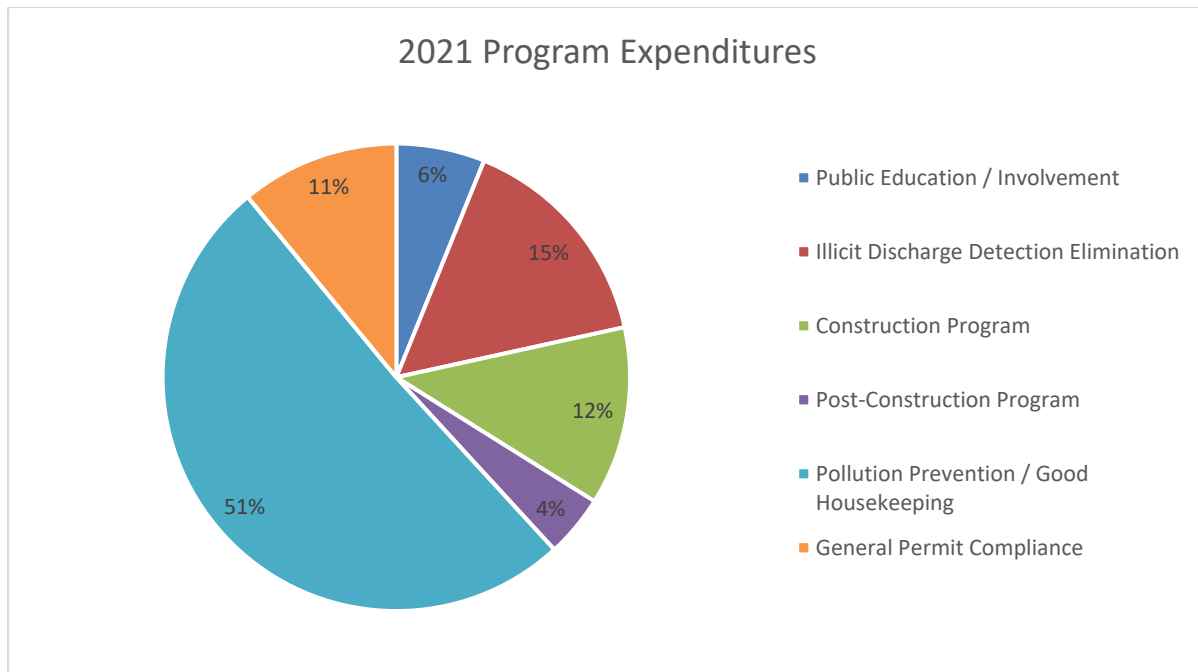


Figure 5. 2021 Program Expenditures

Figure 6 shows the program expenditures over the last eight years.

- The IDDE program expenditures increased in 2021 to \$203,215 compared to \$192,400 in 2020.
- The Construction program cost \$162,600 in 2021, compared to \$204,220 in 2020.
- The General Permit Compliance expenditures decreased in 2021. It was \$334,891 in 2020, and decreased to \$144,501 in 2021.
- The Public Education and Involvement program decreased in 2021. It was \$87,988 in 2020 and decreased to \$80,763 in 2021.
- The P2/GH program increased in 2021 to \$669,839 compared to \$576,210 in 2020.
- The Post-Construction program spending decreased slightly in 2021 to \$56,500 compared to \$56,700 in 2020.

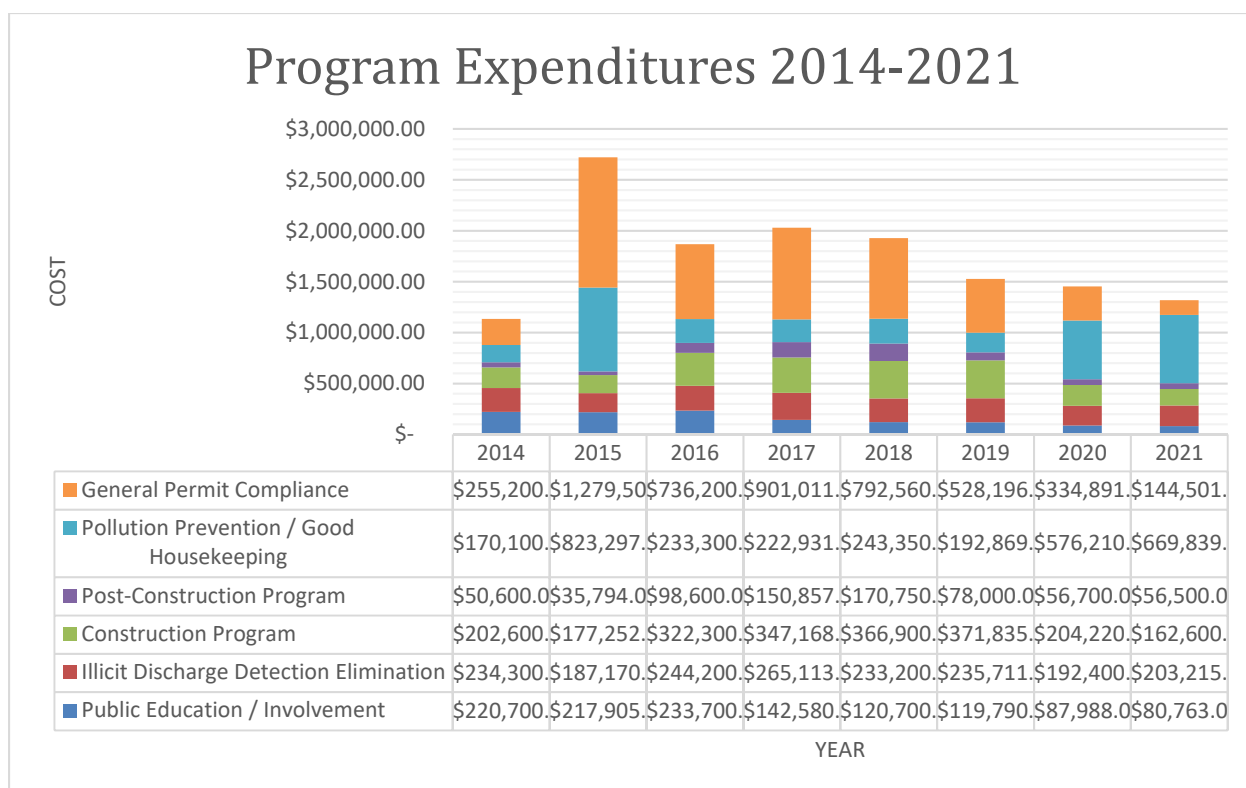


Figure 6. Program Expenditures from 2014-2021

5.2 EDUCATION, INVOLVEMENT, AND TRAINING

The training and education of HDOT-Harbors personnel, tenants, and the public remained the top priority in 2021. Reiteration of the environmental requirements, HDOT-Harbors stormwater procedures, and BMPs has shown to be the best way to facilitate a culture of stormwater pollution awareness and compliance. The large number of people trained, and their high quiz scores attest to the effectiveness of the training program.

Additionally, HDOT-Harbors participated in the joint HDOT “Protect Our Water Conference” on November 17, 2021 along with HDOT Highways Division Oahu and Maui Districts, and HDOT Airports Division. The conference highlighted the joint effort that the HDOT divisions are taking to collectively protect the water resources of the State of Hawaii.

Table 6. Education, Involvement, and Training	
Description	Response
Estimated number of people reached by education program(s)*	550
• Tenant General Stormwater BMP Training	127
• Employee Stormwater Training	227
• Construction & Post-Construction Training	160
• IDDE	36

Table 6. Education, Involvement, and Training	
Description	Response
• New Inspector(s)	1
Average score on the environmental knowledge survey(s):	
• Tenant Stormwater Training	91.74%
• Employee Survey (average % correct responses)	98.1 %
Tenants who had positive view of the training	89.35 %
Unique visitors to the stormwater web page	1,416
Public Education Signs	83
Storm Drain Inlets Stenciled	> 768
“Protect Our Water Conference” Attendees	455
Notes:	
Data is from the 2021calendar year.	
*Some individuals may have been trained at two or more of the training sessions; however, they were counted separately.	

Figure 7 provides data on the total number of employees, tenants, and engineering staff/consultants/contractors that received training for the last eight years.

- In 2021, 227 employees, 127 tenants, and 160 engineering staff consultats/contractors were trained.
- In 2020, 203 employees, 105 tenants, and 139 engineering staff consultants/contractors were trained.
- In 2019, 201 employees, 102 tenants, and 75 engineering staff/consultants/contractors were trained.
- In 2018, 194 employees, 89 tenants, and 26 engineering staff/consultants/contractors were trained.
- In 2017, 189 employees, 123 tenants, and 20 engineering staff/consultants/contractors were trained.
- In 2016, 211 employees, 109 tenants, and 23 engineering staff/consultants/contractors were trained.
- In 2015, 237 employees, 99 tenants, and 28 engineering staff/consultants/contractors were trained.
- In 2014, 318 employees, 101 tenants, and 59 engineering staff/consultants/contractors were trained.

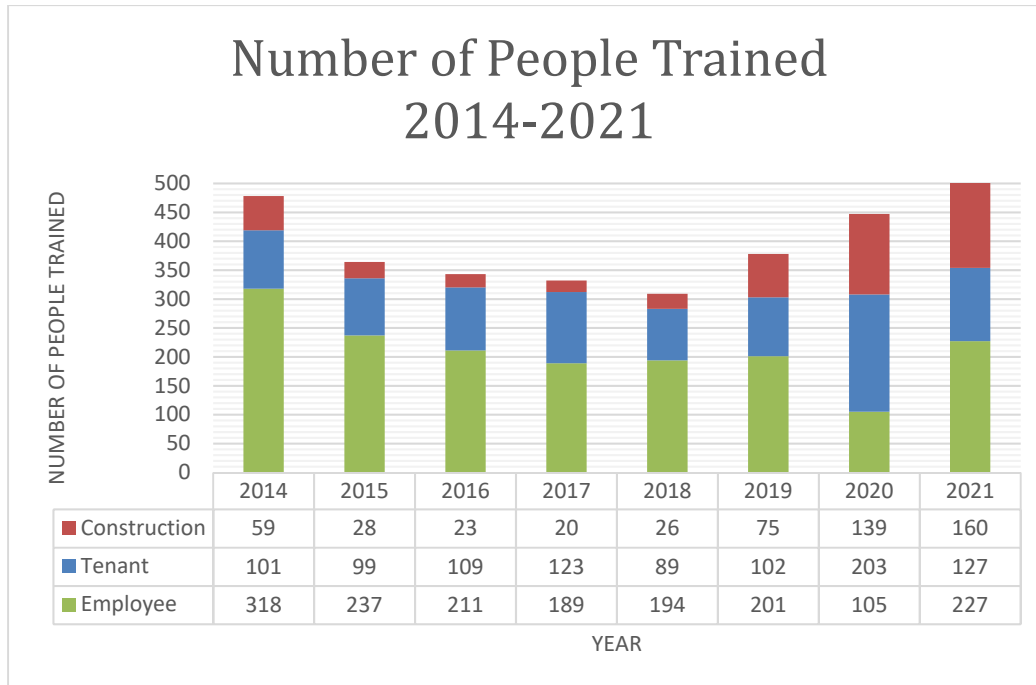


Figure 7. Number of People Trained from 2014-2021

5.3 LEGAL/REGULATORY

All accompanying program elements (listed in Table 12) were in place prior to the 2021 SWMP revision and update.

Table 7. Legal and Regulatory					
Description	In Place Prior 2021 SWMP	Reviewing Existing Authorities	Drafted	Draft in Review	Adopted
Regulatory Mechanism Status (indicate with check)					
Illicit Discharge Detection & Elimination	✓				
Construction and Post-Construction Related Activities	✓				
Post-Development Stormwater Management	✓				
Accompanying Regulation Status (indicate with check)					
Illicit Discharge Detection & Elimination	✓				
Construction and Post-Construction Related Activities	✓				
Post-Development Stormwater Management	✓				

5.4 MAPPING AND ILLICIT DISCHARGES

There were no incidents from suspected illicit discharges that led to the implementation of enforcement procedures via written letters. All investigations ended with the resolution of the illicit discharge issues.

The majority of the illicit discharge reports in 2021 came from HDOT-Harbors staff and tenants. This indicates that the training provided is effective and people understand the proper reporting protocols when potential pollution or a suspected illicit discharge is observed.

Table 8. Mapping and Illicit Discharges	
Description	Response
System-wide mapping complete (Storm Sewer Infrastructure)	100 %
Mapping method(s)	
Paper	when requested
GIS	100 %
Outfalls required to be inspected/screened:	
Honolulu Harbor	0
Kalaeloa Barbers Point Harbor	0
Illicit discharges investigated in 2021	38
SIDR / Public Reports	38
Tenant Inspections	0
Other Tenant Related Investigations	0
Construction Inspections	0
Outfall Reconnaissance	1
Illicit discharges investigated since 2010	338
% of population on sewer	100 %
% of population on septic systems	0 %
Complaints/concerns received from public	0
Note: Data is from the 2021 calendar year.	

Figure 8 shows the data recorded for illicit discharge investigations over the past eight years.

- In 2021, there were 38 investigations performed in follow-up to 38 SIDRs. There was one from the wet weather ORI but none from tenant inspections and construction inspections.
- In 2020, there were 22 investigations performed in follow-up to 22 SIDRs. There were four from tenant inspections and none from construction inspections or ORI reprot.
- In 2019, there were 31 investigations performed in follow-up to 31 SIDRs. There was one from tenant inspections, none from construction inspections, and none from ORI reports.
- In 2018, there were 51 investigations performed in follow-up to 51 SIDRs. There was one from tenant inspections, none from construction inspections, and none from ORI reports.
- In 2017, there were 51 investigations performed for the SIDR. There were only two from

tenant inspections, none from construction inspections, and none from ORI reports.

- In 2016, there were 26 SIDR forms filed, one tenant inspection, no construction inspections, and two ORI reports filed.
- In 2015, there were 27 SIDR forms filed, none tenant inspection, no construction inspections, and one ORI report filed.
- In 2014, there were 12 SIDR forms filed, five tenant inspections, no construction inspections, and 5 ORI reports filed.

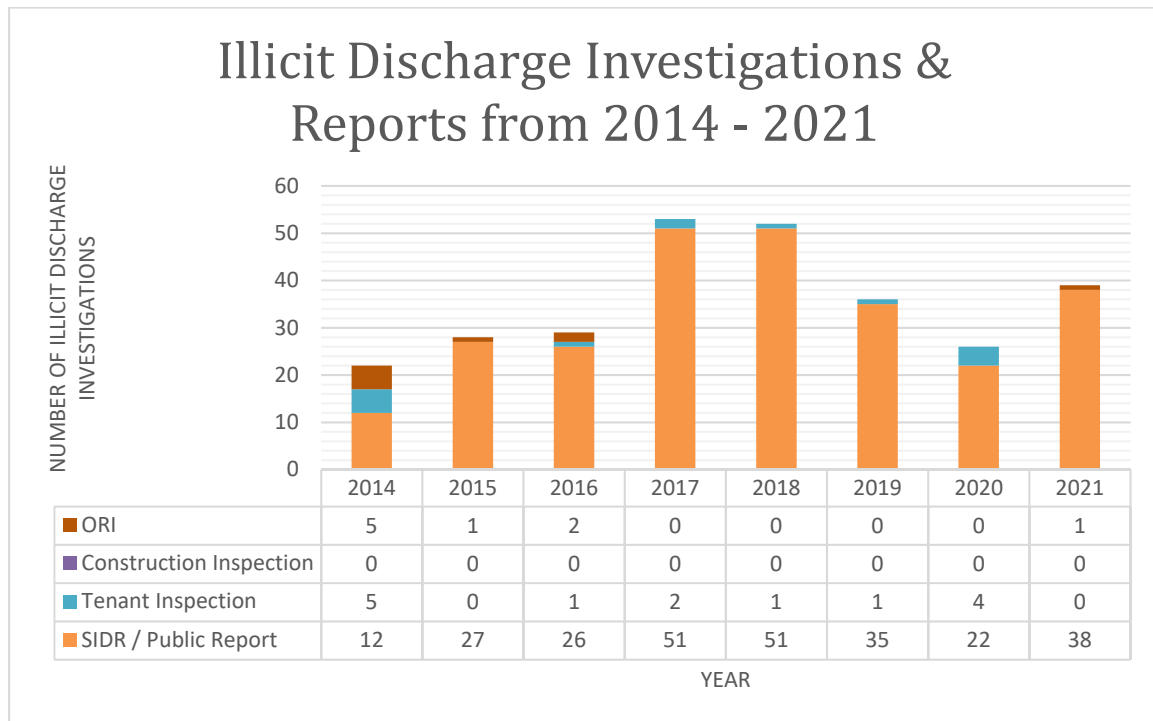


Figure 8. Illicit Discharge Investigations from 2014-2021

5.5 HDOT-HARBORS TENANTS

The risk ranking for tenants in 2021 was consistent with rankings performed in 2020, with 69% of tenant sites classified as low risk. This is consistent with the fact that the majority of tenants at Honolulu Harbor and Kalaheo Barbers Point Harbor conduct small scale operations.

The risk ranking of one tenant site changed from high to medium in 2021 following site inspections. There were no tenant-related enforcement actions in 2021.

HDOT-Harbors highlighted management of non-stormwater discharges in the annual tenant and IDDE trainings to protect harbor waters. HDOT-Harbors is planning to continue to highlight management of non-stormwater discharges in 2022 training events.

Table 9. HDOT-Harbors Tenants	
Description	Response
Total Unique Tenants	51
Total Tenant Sites	66
• Low Risk Rank	43
• Medium Risk Rank	16
• High Risk Rank	3
Number of Tenant Inspections	76
• New	7
• Regular	27
• Final	7
• Site Reconnaissance	35
• Follow-up	1
Number of Enforcement Actions	0
Note: Data is from the 2021 calendar year.	

Figure 9 represents the distribution of tenant risk ranking. 69% of the tenant sites are low risk, 26% are considered medium risk, and only 5% are considered a high risk.

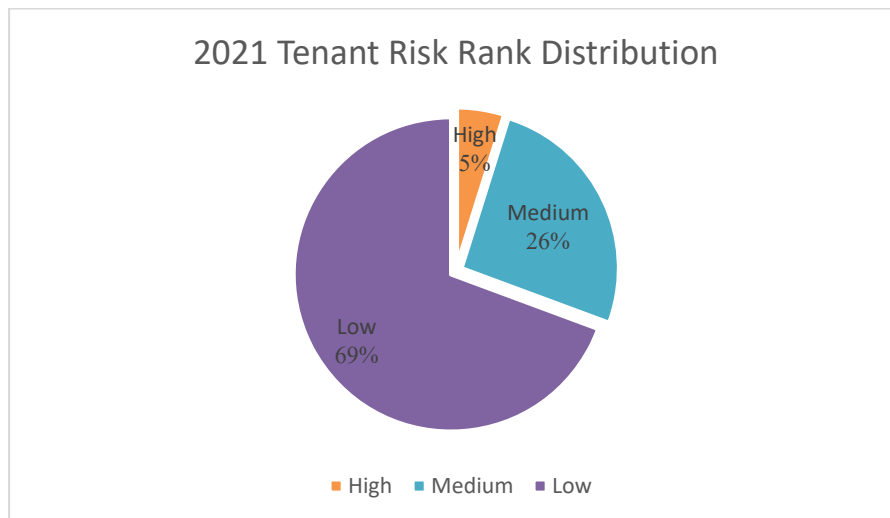


Figure 9. 2021 Tenant Risk Ranking Distribution

5.6 CONSTRUCTION

The number of construction inspections in 2021 increased from 2020. Minor findings were reported and corrected during and following the inspections, leaving zero enforcement actions taken. This indicates that construction-related stormwater training is effective and shows evidence of growing stormwater pollution awareness, as well as the contractor's willingness to learn about the best methods to prevent pollution, and their commitment to protecting the environment.

Table 10. Construction	
Description	Response
Total number of project reviews	44
• HDOT	26
• Tenant	18
Total number of project reviews requiring NGPC	5
Number of inspected construction sites	9
• HDOT-Harbors	5
• Tenant	4
• Others (e.g., CCH, Construction Right-of-Entry (ROE))	1
Estimated percentage of construction starts adequately regulated for erosion and sediment control	100%
Site inspections completed	70
Enforcement actions	0
• Written warning	0
• Notice of Apparent Violation (NAV)	0
• Issuance of stop work order and summons/citations	0
• Referral to HDOH	0
• Fines collected	0
Note: Data is from the 2021 calendar year.	

Figure 10 illustrates the number of construction inspections and enforcement actions taken over the last eight years.

- In 2021, there were 70 construction inspections and no enforcement actions.
- In 2020, there were 55 construction inspections and no enforcement actions.
- In 2019, there were 47 construction inspections and no enforcement actions.
- In 2018, there were 45 construction inspections and no enforcement actions.
- In 2017, there were 31 construction inspections and two enforcement actions.
- In 2016, there were 36 construction inspections and no enforcement actions.
- In 2015, there were 56 construction inspections and six enforcement actions.
- In 2014, there were 47 construction inspections and 36 enforcement actions.

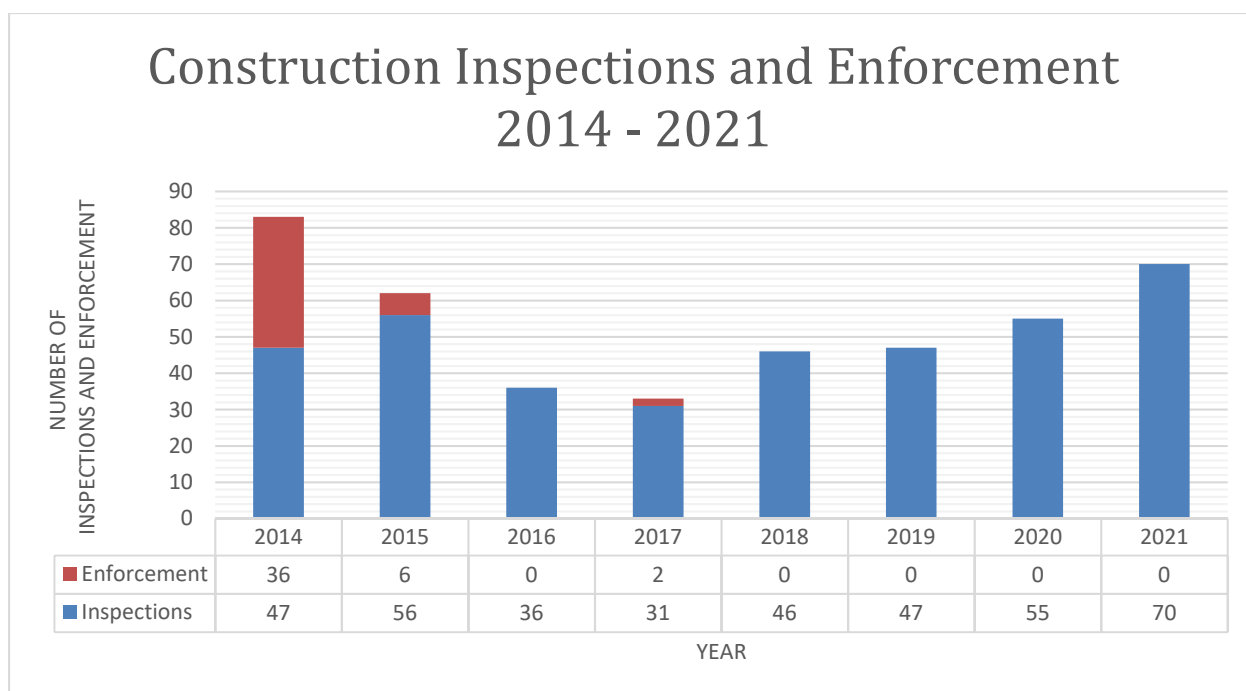


Figure 10. Construction Inspections and Enforcement from 2014-2021

5.7 POST-CONSTRUCTION STORMWATER MANAGEMENT

Table 16 summarized all post-construction related stormwater management. In 2021, there is one ongoing new PBMP installation related project, which is anticipated to be completed in May 2022. Two rounds of semiannual inspections were conducted in 2021 to review proper PBMP operations by HODT-Harbors. Comprehensive PBMP inspection and cleaning has been adjusted to be conducted biennially and therefore will be completed in 2022. PBMP maintenance is required through lease agreements, due diligence, property covenants, ROE/easements, etc. for HDOT-Harbors tenants. 100% of tenants completed their PBMP inspections and cleanings in 2021.

Table 11. Post-Construction Stormwater Management	
Description	Response
Estimated percentage of new development/redevelopment projects adequately regulated for post-construction stormwater control	100 %
Number of new permanent BMPs	0
Site inspections (for proper BMP operation) completed	2
BMP maintenance required through lease agreements, due diligence and property covenants, ROE/easements, etc.	1
Note: Data is from the 2021 calendar year.	

5.8 OPERATIONS AND MAINTENANCE

A total of 162.05 tons of debris was removed in 2021, which is significantly lower compared to

1,124 tons removed in 2020. The storm drain cleaning generated 21.37 tons of waste in 2021 which has increased from 9.65 tons of waste removed in 2020. Restrictions from COVID-19 reduced the amount of waste collected through street sweeping efforts, which was believed to be caused by decreased traffic at the harbors and adjacent areas. In addition, passenger cruise vessels were not operating in 2021 and previously attributed to a significant amount of sweeper wastes. HDOT-Harbors employees and tenants demonstrated their commitment to pollution prevention through the implementation and maintenance of proper BMPs.

Table 12. Operations and Maintenance	
Description	Response
Average frequency of catch basin inspection and cleaning when needed	2 times/year
Number of storm drain cleanings	191
Quantity of screenings/debris removed from storm sewer infrastructure	21.37 tons
Disposal or use of screenings (landfill, publicly owned treatment works (POTW), compost, beneficial use, etc.)	PVT Landfill
• Vacuum truck(s) owned/leased by HDOT-Harbors	1
• Vacuum trucks specified in contracts	No
• % Structures cleaned with vacuum	100%
• % Structures cleaned with manual labor	0%
• Rotary brush street sweepers owned/leased	4
• Vacuum street sweepers specified in contracts	No
Average frequency of street sweeping	2 times/week
Quantity of sand/debris collected by sweeping	39.86 tons
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)	Landfill
• Green Waste	5.99 tons
• Refuse	80.86 tons
• Scrap Metals	13.97 tons
• Human Waste	0
• Used Batteries	0
• Electronic Waste	0
Note: Data is from the 2021 calendar year.	

Figure 11 shows the level of debris and waste removed due to small MS4 maintenance actions over the last eight years.

- In 2021, HDOT-Harbors removed 5.99 tons of green waste, 80.86 tons of refuse, 39.8 tons of sweeper waste, 13.97 tons of scrap metal, and 21.37 tons of storm drain waste.
- In 2020, HDOT-Harbors removed 40.03 tons of green waste, 755.95 tons of refuse, 268.14 tons of sweeper waste, 51.39 tons of scrap metal, and 9.65 tons of storm drain waste.
- In 2019, HDOT-Harbors removed 6.01 tons of green waste, 853.22 tons of refuse, 233.95 tons of sweeper waste, 29.41 tons of scrap metal, 4.55 tons of recycled metal, and 6.31 tons of storm drain waste.
- In 2018, HDOT-Harbors removed 17.58 tons of green waste, 801.98 tons of refuse, 259.53 tons of sweeper waste, 26.48 tons of scrap metal, 3.77 tons of recycled metal, and 1.13 tons of storm drain waste.

- In 2017, HDOT-Harbors removed 36.74 tons of green waste, 748.30 tons of refuse, 23 tons of sweeper waste, 15.80 tons of recycled material, 15 tons of recycled metal, and 4 tons of storm drain waste.
- In 2016, HDOT-Harbors removed 50.66 tons of green waste, 845.33 tons of refuse, 23.11 tons of sweeper waste, 49.66 tons of recycled metal, and 12 tons of storm drain waste.
- In 2015, HDOT-Harbors removed 33 tons of green waste, 802 tons of refuse, 121 tons of sweeper waste, 103 tons of recycled metal, and 121 tons of storm drain waste.
- In 2014, HDOT-Harbors removed 36.09 tons of green waste, 1,293.12 tons of refuse, 134.81 tons of sweeper waste, 0 tons of recycled metal, and 20.45 tons of storm drain waste.

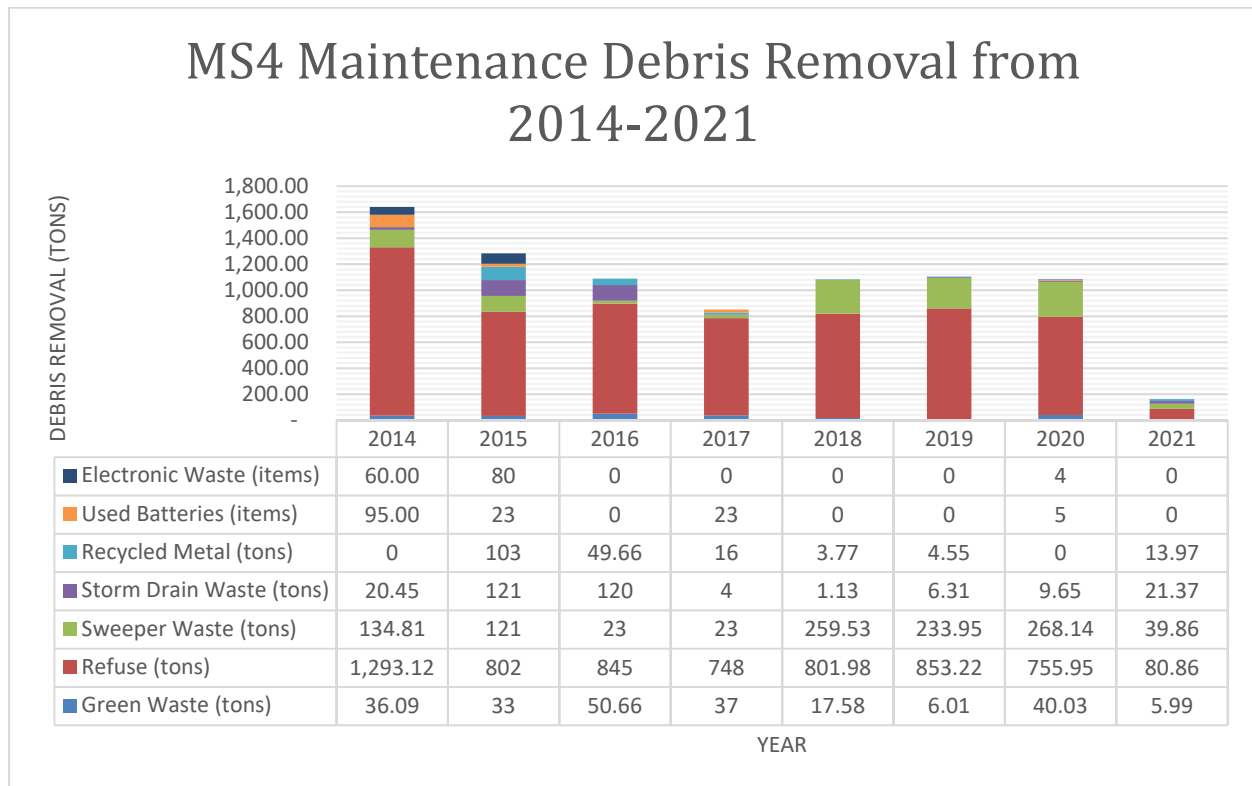


Figure 11. MS4 Maintenance and Debris Removal from 2014-2021

6 CONCLUSION

HDOT-Harbors continues to strive towards compliance with all requirements of the CWA and conditions of their NPGCs and CD. The measurable goals that have been developed to gauge permit compliance and program effectiveness for each MCM has been deemed successful in 2021. All six MCMs are 100% in compliance.

HDOT-Harbors revised their SWMP and program manuals in 2021 to update any outmoded BMP measurable goals into more appropriate targets and included current program activities, policies, and requirements that have evolved over the last several years. Additional revisions may be required following the official publication of the renewed HAR § 11-55, Appendix K permit.

In 2021, HDOT-Harbors successfully met all compliance requirements and the timeline listed in the 2014 Consent Decree.

7 ATTACHMENTS

The information collected and analyzed for this report is contained in the following attachments at the end of this document and supplied on the CD. For convenience, attachments are organized by program.

Public Education, Outreach, and Involvement

Attachment 1. Newspaper Advertisement Describing HDOT-Harbors Pollution Prevention Efforts

Attachment 2. Outreach Handouts

- a. BMP Fact Sheets
- b. Reduce, Reuse, Recycle Brochure
- c. Construction Brochure
- d. Post-Construction Brochure
- e. Construction and Post-Construction BMP Brochure
- f. New Tenant Welcome Brochure

Training

Attachment 3. Tenant Training

- a. Training Notice Letter
- b. Presentation Slides
- c. Questionnaire & Evaluation Results and Logged Records

Attachment 4. Construction and Post-Construction Training

- a. Presentation Slides
- b. Quiz & Survey Results and Logged Records
- c. POW Conference Summary

Attachment 5. HDOT-Harbors Employee Training

- a. Outreach Educational Email
- b. Survey Results and Logged Records

Attachment 6. Illicit Discharge Detection Elimination Training

- a. Presentation Slides
- b. Questionnaire Results and Logged Records

Attachment 7. Inspector Training

- a. Tenant Inspection Manual Presentation Slides
- b. Completed Quiz

Illicit Discharge Detection and Elimination

Attachment 8. Tenant Inventory, Risk Ranking and Inspection Summary

Attachment 9. Outfall Reconnaissance Inventory and Inspection Summary

- a. Dry Weather ORI
- b. Wet Weather ORI

Attachment 10. Suspected Illicit Discharge Investigations

- a. Suspected Illicit Discharge Reporting in 2021

Construction / Post-Construction

Attachment 11. Construction Project Inventory and Inspection Summary

Attachment 12. Reviewed Construction and Post-Construction Projects

- a. HDOT-Harbors Division Projects
- b. Tenant Projects

Miscellaneous Information

Attachment 13. Kalaeloa Barbers Point Harbor Annual Stockpile Inspection Report

Attachment 14. Permanent BMP Inspection Log

Attachment 15. Storm Drain Inspection and Cleaning

- a. Storm Drain Screening Inspection Log
- b. Storm Drain Comprehensive Inspection and Cleaning Log

Attachment 16. Street Sweeper Log

Attachment 17. 2021 Stormwater Management Plan